

Item 1 - Cover Page

Pioneer Wealth Management Group

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This Disclosure Brochure provides information about the qualifications and business practices of Pioneer Wealth Management Group (“Advisor” or “Firm”). If you have any questions about the contents of this Brochure, please contact us at (512) 334-6800.

Pioneer Wealth Management Group is a Registered Investment Adviser located in the State of Texas. 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. Registration of an investment advisor does not imply any special level of skill or training. This Disclosure Brochure provides information about Pioneer Wealth Management Group to assist you in determining whether to hire or retain the Advisor.

Additional information about Pioneer Wealth Management Group is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

The last annual update of this brochure was February 9, 2023. The following changes have been made to this Disclosure Brochure since that update:

- We no longer use the services of Ramsey Solutions and SmartAsset.
- In certain instances, we offer our financial planning services as an hourly engagement at an hourly rate from \$250 to \$1,000 per hour. See Item 5.
- Occasionally, our Investment Advisor Representatives provide investment guidance to another Registered Investment Adviser's financial coaches and their clients. See Item 10.

From time to time, we will amend this Disclosure Brochure to reflect changes in our business practices, regulations, and updates required by securities regulators. This complete Disclosure Brochure of 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 our firm name or our CRD# 133429. You may also request a copy of this Disclosure Brochure at any time by contacting us at (512) 334-6800.

Item 3 - Table of Contents

Item 1 - Cover Page.....	1
Item 2 - Material Changes.....	2
Item 3 - Table of Contents.....	3
Item 4 - Advisory Business.....	4
Item 5 - Fees and Compensation	5
Item 6 - Performance Based Fees and Side-By-Side Management.....	7
Item 7 - Types of Clients.....	7
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9 - Disciplinary Information	8
Item 10 - Other Financial Industry Activities and Affiliations.....	8
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ...	9
Item 12 - Brokerage Practices	9
Item 13 - Review of Accounts	10
Item 14 - Client Referrals and Other Compensation.....	11
Item 15 - Custody	11
Item 16 - Investment Discretion.....	12
Item 17 - Voting Client Securities	12
Item 18 - Financial Information.....	12

Item 4 - Advisory Business

Pioneer Wealth Management Group (“Advisor” or “Firm”) is an SEC-registered investment advisor incorporated in Texas since 2005. Milad Taghehchian is the principal owner. Pioneer Wealth Management Group is a fiduciary and is required to always act in its client’s best interest. Pioneer Wealth Management Group provides the following services to its clients:

Financial Planning

Pioneer Wealth Management Group provides financial planning services to clients. The Firm recommends each new client engage in financial planning services or as part of its asset management services. Financial planning evaluates a client’s present and future financial situation, using known variables and reasonable assumptions to predict future cash flow, investment returns, and distributions. Financial planning encompasses several areas of financial need, including any or all of the following:

- **Data Gathering:** Advisor gathers required information through requests for the client’s documents and conversations with the client. The information gathered during this engagement will assist Advisor in determining the most appropriate course of action for a client’s financial and investment activity.
- **Cash Flow:** Advisor compares the client’s current and future income flows with outflows to taxes, savings, liability payments, and other expenses. Cash flow helps to determine needed cash reserves, insurance needs, future expenses, and income needed from investments.
- **Tax Planning:** Advisor reviews prior years’ taxes and projects current and future tax liabilities from investment accounts, sales transactions, and business income. Advisor may recommend strategies to improve tax situation going forward.
- **Retirement:** Advisor analyzes savings and investment plans to help the client feel secure about retirement decision. Advisor may simulate scenarios to evaluate the strengths of a client’s retirement plan.
- **Education:** Advisor analyzes existing education savings, works with the client to define goals for education funding, and creates a savings plan to help the client achieve their stated goals.
- **Investments:** Advisor analyzes current investments for alignment with the client’s objectives, risk, and expected returns. Advisor evaluates the impact of investment alternatives on the client’s portfolio.
- **Insurance:** Advisor reviews existing policies to ensure adequate coverage for life, health, disability, long-term care, liability, and property & casualty.
- **Estate:** Advisor assists in assessing and developing long-term strategies that align with their family situation and goals. Advisor reviews the client’s needs concerning care and support to family members, instructions on end-of-life care or financial management, and recommendations for estate planning documents.

By request, the Firm will offer referrals for service providers who can help the client implement recommendations. A financial plan or services rendered to the client will usually include general recommendations for a course of action to be taken by the client.

Asset Management

Pioneer Wealth Management Group provides ongoing investment advice based on the individual needs of the client. To determine a suitable investment recommendation for an individual client, Advisor shall

review the client's situation. Such review will include, but would not necessarily be limited to, investment objectives, consideration of the client's overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to the client's particular circumstances.

Following this review, Advisor will create an asset allocation recommendation and an investment policy statement. The investment policy statement guides portfolio management of client's investments.

Investment recommendations are not limited to a specific product or service. Advisor typically constructs portfolios consisting of securities and investments, equity securities, corporate debt securities, certificates of deposit, municipal securities, mutual funds, exchange-traded funds, government securities, option contracts, real estate, and oil and gas interests. Advisor will only recommend products consistent with the client's stated objectives, risk tolerance, liquidity needs, and suitability. Clients can impose restrictions on investing in certain securities or types of securities.

Pension Consulting

Pioneer Wealth Management Group provides consulting services for clients with small group 401ks. Advisor can provide model portfolios for the participants.

As of February 16, 2024, Advisor had \$214,811,994 of discretionary assets under management.

Item 5 - Fees and Compensation

The following details the fee structure and compensation for services provided by Advisor. It is customary for Advisor to provide an initial, no obligation, no cost meeting to become familiar with the client's circumstances before recommending a fee structure. Each client is required to enter into a written agreement with Advisor for services.

Financial Planning Services

Advisor provides clients with financial planning services that are specific or modular in their preparation (unique to each client in their depth of preparation). Topics included as part of the financial planning services include any or all of the following: organization and assessment, retirement planning, education planning, long-term care, insurance planning, debt management, investments, tax planning, estate planning, and life events.

Financial planning services are billed annually, monthly, hourly, or by fixed fee. Fees vary based on scope of services and complexity. An estimate of financial planning fees will be provided to the client prior to engaging the client for financial planning services.

One-Time Onboarding Fee

A one-time setup payment may be billed at contract signing to reflect the work required during a new client's initial onboarding. Advisor will reduce or waive this fee at its discretion.

Annual Wealth Planning

An annual wealth planning engagement includes comprehensive financial planning services for a full year. Annual fees are billed at a fixed price that varies depending on the scope of services and the

complexity of the client’s situation. An estimate for total costs will be provided to the client prior to engaging in annual wealth planning. Annual wealth planning services are eligible for renewal annually based on the service agreement contract date. Clients may request a payment schedule.

Hourly Planning

In certain instances, Advisor offers its financial planning services as an hourly engagement at an hourly rate from \$250 to \$1,000 per hour. Hourly fees are billed in arrears based on hours worked, including preparation, meeting time, and correspondence. Advisor and the client must agree on scope of work upon engagement.

Flat Fee

Advisor also offers its financial planning services as a flat fee for an agreed-upon scope of work. Payment is due at engagement.

Advisory Subscription

An Advisory Subscription engagement could be appropriate for clients with simpler financial planning needs. Advisory Subscription includes two 1-hour meetings per year, phone and email consultations as necessary, and full access to Pioneer360, the Firm’s financial planning portal. Fees are assessed monthly or quarterly with a minimum 12-month commitment. Subscription services auto-renew until canceled.

Asset Management

Advisor provides its clients with investment advisory and consultation services on a “fee for service” basis.

Clients are charged for Advisor’s asset management services based on a percentage of assets under management. Fees are based on the following incremental fee schedule.

Annual Fee	Assets Under Management	Monthly
1.00%	On the first \$2,000,000	0.0833%
0.85%	On the next \$2,000,000	0.0708%
0.55%	On the next \$2,000,000	0.0458%
0.25%	On the next \$4,000,000	0.0208%
0.10%	\$10,000,001 +	0.0083%

For clients who engage Pioneer Wealth Management Group to provide asset management services, Advisor may waive or reduce the Financial Planning Services fee, up and to the point that only the asset management fee applies. Clients may sign a service agreement that combines financial planning and asset management services.

Fees are negotiable at the sole discretion of Advisor. Unless otherwise instructed, the client’s fees are based on the aggregate assets under management for the client’s household for fee billing purposes. All securities held in accounts managed by Pioneer Wealth Management Group will be independently valued by the custodian.

The exact services and fees will be agreed upon and disclosed in the agreement for services prior to services being provided. The annual asset management fee is divided and billed monthly in arrears at the beginning of each calendar month and will be based on the amount of assets under management at the end of the previous calendar month. Exceptions can occur based on the software used. Advisor prefers to have its advisory fees deducted directly from the client's account. In these cases, clients must provide the custodian with written authorization to have fees deducted from the account and paid to Advisor. Upon discretion of Advisor, clients can pay fees directly to Advisor. For clients that pay directly, payment is due upon receipt of a billing statement from Advisor. The custodian delivers quarterly or monthly account statements to clients. Among other details, account statements list disbursements for the account including the amount of the advisory fee when deducted directly from the account. Relationship is valid until terminated.

Other Fees

In addition to Advisor's asset management fee(s), the client will be assessed other fees by parties independent from Advisor. The client will also incur, relative to certain investment products (such as mutual funds), charges imposed directly at the investment product level (e.g., advisory fees, administrative fees, and other fund expenses). Brokerage fees/commissions charged to the client for securities trade executions will be billed to the client by the broker-dealer or custodian of record for the client account, not Advisor.

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

Advisor does not participate in performance-based fees or side-by-side management.

Item 7 - Types of Clients

The types of clients Advisor generally provides investment advice to include, but is not limited to, individuals, high net worth individuals, trusts, estates, or small businesses. Advisor does not impose a minimum size for establishing a financial planning or asset management relationship.

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

Pioneer Wealth Management Group believes in long-term investing through a well-diversified portfolio consistent with the client's financial goals. Each client engagement entails a review of the client's investment goals, financial situation, time horizon, risk tolerance, and other factors to develop an appropriate strategy for managing a client's account(s). Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of the client's account(s). Client is responsible for informing Advisor of any changes in financial condition, goals, or other factors that could impact investment recommendations.

Advisor will use some or all of the following methods of analysis: Fundamental, Technical, or Cyclical in formulating its investment strategies for giving investment advice or managing client assets. Research and analysis are derived from numerous sources, including financial media companies, third-party research materials, internet sources, and review of company activities.

Advisor mainly recommends Exchange-Traded Funds (ETFs) and mutual funds within a globally diversified portfolio. Clients may select a focus on keeping fees as low as possible, factor-based investing, or Environmental Social Governance (ESG) investing.

Investing in securities involves certain investment risks. Securities will fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Pioneer Wealth Management Group will assist clients in determining an appropriate strategy based on their risk tolerance and financial goals. There is no guarantee that a client will meet their investment goals. Following are some investment risks the client should understand and consider:

Market Risks

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

Exchange Traded Fund (ETF) Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based on market movements and may dissociate from an index tracked by the ETF or the price of underlying investments. An ETF purchased or sold at one point in the day mostly likely will have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of open-end mutual funds is subject to market risk, including the possible loss of principal. The price of the open-end mutual funds will fluctuate with the value of 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 in the same day.

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 encouraged to discuss these risks with Advisor.

Item 9 - Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Advisor or the Firm's management persons.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Pioneer Wealth Management Group nor any of its supervised persons are affiliated with any other Investment Advisor or Broker/Dealer.

Neither Pioneer Wealth Management Group nor any of its supervised persons have any relationships or arrangements with other firms in the financial industry that are material to Pioneer Wealth Management Group's advisory business. However, there may occasionally be board members that are involved in legal or financial fields. These relationships do not have any material impact on the advisory business of the Firm. Occasionally, Investment Advisor Representatives from Pioneer Wealth

Management Group provide investment guidance to Money Positive's (CRD # 218518) financial coaches and their clients.

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

Pioneer Wealth Management Group has adopted a Code of Ethics for all supervised persons describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Pioneer Wealth Management Group must acknowledge the terms of the Code of Ethics annually, or as amended.

Our officers, directors, employees, or affiliates will, from time to time, invest their own assets with the same Advisor or in the same mutual funds or other securities in which our clients' assets have been invested.

We have instituted procedures for monitoring securities transactions of our supervised persons, which include a quarterly review of reports of personal securities transactions effected by our supervised persons and their immediate families during the preceding quarter. In addition, if a supervised person maintains a securities trading account at another broker-dealer that is directly managed by the employee, the other broker-dealer will provide a copy of the employee's statement to a manager who reviews it for compliance purposes.

We have also adopted policies and procedures to prevent the misuse of "insider" information (material, non-public information). A copy of such policies and procedures is available to any person upon request.

Item 12 - Brokerage Practices

Best Execution

In an effort to provide the best services at the most reasonable commission rates possible, we do recommend brokers based on the following factors:

- Stability, reputation, and financial responsibility of the broker/dealer;
- Competitive commission rates and prices;
- Execution capability based on order size, market breadth, availability of accurate information, and other trading characteristics;
- Quantity and quality of research received from the broker/dealer;
- Confidentiality;
- Responsiveness;
- The technology and trading platforms of the broker/dealer; and
- Other factors that are useful in providing investment management services to clients.

Soft Dollars

While Pioneer Wealth Management Group does not have a formal soft-dollar arrangement with a broker/dealer, Advisor recommends or uses a broker who provides useful research and securities transaction services even though another broker may charge a lower commission and offer no research services or securities transaction assistance. Research received from a broker/dealer may be useful in servicing all our clients, and not all such research may be useful for a particular transaction or account.

In obtaining best execution for clients, Pioneer Wealth Management Group directs brokerage transactions to brokers who provide research and execution services to Advisor and indirectly to its clients. Research services obtained through the use of soft dollars are developed by brokers to whom brokerage is directed or by third parties compensated by the broker. Advisor will not use each research service available to service each client. As a result, a client will pay brokerage commissions that are used to purchase research services that are not used to benefit that specific client. Broker/dealers could be paid commission for effecting transactions for our clients that are greater than amounts other broker/dealers would have charged for these same transactions. Pioneer Wealth Management Group determines in good faith that transaction costs are reasonable in relation to the value of brokerage and research services provided by those broker/dealers, either in terms of a particular transaction or our overall duty to its discretionary investment advisory clients.

When Pioneer Wealth Management Group uses client brokerage commissions to obtain research or brokerage services, we receive a benefit to the extent that Pioneer does not have to produce such products internally or compensate third parties with Advisor resources. Therefore, such use of client brokerage commissions results in a conflict of interest, because we have an incentive to direct client brokerage to brokers who provide research and services we utilize, even if these brokers do not offer the best price or commission rates for our clients.

Trade Allocation

Pioneer Wealth Management Group will block trades where appropriate and in the clients' best interest. Blocking of trades permits trading of aggregate blocks of securities from multiple client accounts, so long as transaction costs are shared equally and on a pro-rata basis between all accounts included in any block. Block trading allows us to execute equity trades in a timelier, more equitable manner, at an average share price.

Pioneer Wealth Management Group will execute client transactions separately for an individual account or client if in the account or client's best interest. Advisor will either recommend a broker that offers automated rebalancing or a broker that requires manual rebalancing. Consequently, certain client trades could be executed before others, at a different price and/or commission rate. In these situations, clients will not receive volume discounts available to block trades.

Item 13 - Review of Accounts

Account reviews are provided in connection with asset management accounts. For clients participating in this program, one of Advisor's representatives will contact clients at least annually for the purpose of reviewing their account and to determine if there have been changes in their financial situation or investment objectives. Performance is reviewed during the annual meetings. The calendar is the main

triggering factor, although more frequent reviews can also be triggered by changes in the client's circumstances, client request, or changes within the market.

The underlying investments held in client accounts are reviewed on a more frequent basis. Portfolios are usually reviewed as frequently as weekly, and not less than monthly. Triggering factors for changes to underlying portfolios include the relative valuation changes between asset classes, valuation of the individual security, or economic or political changes that change the perceived risk/reward ratio of a sector or sub-sector of the global or national economy.

Client investment portfolios are reviewed on an ongoing basis. For financial plans, the calendar is the main triggering factor, although more frequent reviews can also be triggered by changes in the client's circumstances, client request, or changes within the market.

Clients will receive account statements directly from the custodian. Statements will be delivered no less than quarterly but as frequent as monthly. In addition, Advisor will provide a periodic newsletter covering general financial and investment topics, explaining current views of the global economies and factors driving investment decisions.

Item 14 - Client Referrals and Other Compensation

Advisor does not compensate any person, directly or indirectly, for client referrals.

Advisor does not have arrangements with someone who is not a client that provides an economic benefit to Advisor for providing investment advice or other advisory services to its clients.

Item 15 - Custody

Advisor does not maintain physical possession of any client account assets. Clients' assets must be held by a bank, broker/dealer, mutual fund transfer agent, or other such institution deemed a "qualified custodian" by the SEC.

Deductions for Advisory Fees

Clients electing asset management services may have advisory fees directly debited from their accounts. As part of this billing process, the client's custodian is advised of the fee amount to be deducted. At least quarterly, the custodian is required to send the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact Advisor directly if they believe there is an error in their statement.

Account Statements

Advisor may send account statements directly to asset management clients in addition to the periodic statements clients will receive from their custodian. Account statements will be sent to clients on request. Pioneer Wealth Management Group urges clients to carefully compare the information provided on these statements to ensure all account transactions, holdings, and values are correct and current.

Standing Letters of Authorization

Advisor's custodial agreement may enable Advisor to withdraw, or transfer, client funds or securities upon instruction to the custodian. In most cases, Advisor only takes custody within the scope of fee withdrawal from a client's account.

Based on the No-Action Letter submitted by the Investment Adviser Association dated February 21, 2017, the SEC indicates that an adviser generally has custody where a client grants the adviser power in a standing letter of authorization ("SLOA") to conduct third party transfers (i.e., instruct the qualified custodian to accept the adviser's direction on the client's behalf to move money to a third party designated in the SLOA). These SLOAs have been put in place upon the client's written request and signature. For instance, the amount or timing of the transfers may not be on the SLOA submitted to the custodian. However, at a future date, a client will contact Advisor requesting that Advisor submit instructions to the custodian to remit a specific dollar amount from the account to the designated third party, both of which are identified on the SLOA on file). As further outlined in the No-Action letter, Advisor is exempt from certain ongoing requirements of the Custody Rule as the Firm complies with the stated conditions of the letter.

Item 16 - Investment Discretion

Upon receiving written authorization from the client, Advisor provides discretionary investment advisory services for client accounts. Advisor's discretionary authority will be granted by the client in the client agreement. When discretionary authority is granted, it is limited in that Advisor will only be given discretionary trading authority. This authority will allow Advisor to determine the type of securities and the amount of securities that can be bought or sold for the client portfolio without obtaining the client's consent for each transaction.

Item 17 - Voting Client Securities

Advisor does not perform proxy-voting services on a client's behalf. Clients are instructed to read through the information provided with the proxy-voting documents and to make a determination based on the information provided. Upon request from the client, Advisor may provide limited clarifications of the issues presented in the proxy voting materials based on Advisor's understanding. However, the client will have the ultimate responsibility for making all proxy-voting decisions.

Item 18 - Financial Information

Advisor does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Advisor is not organized as a sole proprietor. Advisor does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to its clients. Advisor has not been the subject of a bankruptcy petition at any time during the past ten years.