Item 1. Cover Page ADV Part 2A

PVG Asset Management Corporation

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DISCLOSURE DOCUMENT AND INFORMATIONAL BROCHURE

This brochure provides information about the qualifications and business practices of PVG Asset Management Corporation. If you have any questions about the contents of this brochure, contact PVG Asset Management by telephone at 303.526.0548 or by email at information@pvgasset.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 PVG Asset Management Corporation also is available on the SEC's website at www.adviserinfo.sec.gov.

PVG Asset Management is a registered as an investment adviser with the Securities and Exchange Commission (SEC). Registration with the SEC is for the purpose of U.S. Government oversight only and does not imply any advisor has achieved a specific level of education, skill or training.

Item 2. Material Changes

PVG has a new office location at 500 University Blvd., Suite 205, Jupiter, FL, 33458, effective December of 2019.This location conducts PVG Asset Management Corporation advisory business as (dba) Barclay Breland Family Office, LLC. Christopher B. Kelly, Licensed Investment Advisor Representative CRD #22306054 is not an owner or a member of PVG management.

Item 3. Table of Contents

The enclosed material is intended for financial consultants and advisers, potential or individual investors considering PVG Asset Management as an asset manager. This material should be read in conjunction with other brochure material.

Item 4. Advisory Business

A. PVG Asset Management Corporation, a Colorado Corporation with its headquarters in Centennial Colorado. PVG is a fee-based investment adviser specializing in money management services for individuals, corporations, registered investment advisers and institutions. The firm was established in 1988. The primary owner of PVG, a C-Corp, is Patrick Adams.

B. As an asset manager, any financial advice provided is incidental to asset management services. PVG does not provide financial planning, offer tax advice, insurance or other wealth management services unless specifically stated in a signed agreement specifying such services and the fees for these additional services. An asset management client selects a specific strategy displayed on a PVG investment advisory agreement. Clients may change strategies upon notification to firm. PVG clients may opt to invest in individual stocks and bonds, or Exchange Traded Funds (ETFs). Our overall asset management approach is characterized as “Loss Averse Investing” to emphasize that loss aversion is a primary investment objective, in contrast to tracking market or peer-based indices. Strategies where assets move more or less like the overall markets, or traditional strategies, are a part of the firm’s management. PVG’s loss averse strategies hedge against the possibility of weak markets by moving in and out of equities, fixed income, or by buying inverse ETFs. Advisory clients may also direct PVG to purchase, sell or hold individual investment products of their choice rather than participate in the “Adverse Investing” strategies. In such cases, PVG does not accept responsibility for client choices.

C. PVG cannot guarantee against investment losses. Investing in securities involves risk of loss that clients should be prepared to bear regardless of the strategy being loss averse.

D. Besides individual accounts, PVG manages accounts under sub-contract for other investment advisors. In such cases, PVG shares a portion of the total management fee paid to the other investment advisor. In these circumstances, the other investment advisor maintains the primary client relationship. PVG merely manages the assets based upon the parameters provided by that investment advisor and does not share responsibility for any client communication, on-going review of the client’s risk profile and appropriateness of investment strategies for that client.

E. PVG’s Investment Advisory agreements also include a risk questionnaire which attempts to measure the risk tolerance acceptable to the potential client so that we more accurately direct them to the appropriate PVG investment strategy. Because client risk appropriateness is very subjective and client’s often change their perception of risk as markets evolve, PVG makes no claim that it’s risk profile questionnaire can accurately capture any client's future perception of risk. In addition, the riskiness of assets often changes significantly under unusual circumstances or market conditions.

F. Investment Advisor Reps (IARs), having an association with PVG, may offer wealth management services including asset management, asset allocation, and other services which may encompass third party money managers, firms, and service providers not affiliated with PVG. This may involve the review of client's legal, accounting, insurance, other professional advisors and other services. The IAR or other third party service providers may have ancillary agreements and fees for these services which may be in addition to PVG money management or advisor services fees, although they may be included in a WRAP structure payable to PVG where the client pays a single fee for all services. For instance, such additional fees may include an advisory fee for the allocation service, a separate fee to PVG for portfolio management, or additional fees to outside managers and other entities. Any ancillary agreement, other than a PVG Asset Management Agreement provided by an IAR must specify the services and fees charged and document whether PVG is monitoring and compensated for any asset or service. PVG accepts no responsibility for any assets or services which it is not monitoring or for which it is not compensated. As with all investing, these other assets and services can cause client losses for many different reasons. Services of the IAR may be provided in part or in whole by PVG. Their legal business names and logos may appear on PVG marketing materials and/or client statements, including titling such as PVG Asset Management, Company, dba as "the name of their own business entity. All public advertising produced by these entities is reviewed by PVG and read "Advisory Services offered through PVG Asset Management Corporation, a SEC registered Investment Adviser. Registration with PVG Asset Management does not imply any level of skill or training of the IAR. However, IAR's associated with PVG operate as separate business entities and must disclose the extent and limit of their association with PVG to clients and potential clients.

G. PVG may provide customized investment management services that include restrictions on the purchase or sale of certain securities, within the boundaries of our Loss Averse Investing strategies or individual client directives for specific product prohibitions. PVG is not responsible for restricted positions in a client accounts, including stocks, bonds, REITs, hedge funds, private placements and any other type of registered or non- registered security that is not specifically part of a PVG strategy. When such unmanaged positions appear on a PVG statement or a custodial statement it is for the benefit of the client and not the responsibility of PVG, regardless of fee structure.

H. Clients may make additions to and withdrawals from their account at any time, subject to PVGs' right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to PVG, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. PVG may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, and short-term redemption or other fees, that may be assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

I. Clients generally provide PVG with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to PVG.

J. As of 12/31/2019, PVG had 1316 total accounts with $293,065,00 of assets under management. 1315 discretionary accounts with $281,292,000 and 1 non-discretionary account with $11,136,000 in assets.

Item 5. Fees and Compensation

A. PVG charges a base management fee of 2% which is frequently negotiated lower, depending upon client circumstances, account size, and source, such as those from financial advisors and broker dealers where PVG may act as a sub-advisor.

B. PVG generally bills fees quarterly in advance directly to a client's account or to the client, depending upon client instructions. Clients will have signed permission for the withdrawal of fees with both PVG and the custodian. Exceptions include those where PVG acts as a sub-advisor.

C. Besides management fees, clients may incur charges from their selected broker/custodian such as custodial fees, trading commissions and internal fund charges. These charges may be negotiated by PVG, the client, or may be set by the financial advisor or broker/dealer introducing a client to PVG. PVG does not share in any of these fees or charges.

D. Unearned fees, if a client terminates PVG before any billed fees are earned, fees are refunded upon the request of the client. Client fees will be refunded in the case of termination, based on the formula stated on their contract, and the amount refunded is based upon the number of days remaining in a billing period divided by the total days in that billing period. PVG or the client may terminate the investment advisory contract at any time by giving written or electronic notice.

E. PVG receives no other compensation, other than management fees billed as described above.

Item 6. Performance Based Fees

PVG does not currently charge any performance-based fees.

Item 7. Types of Clients

PVG manages accounts for individuals, corporate and individual retirement plans, foundations and endowments. Minimum account sizes vary greatly based on individual client considerations and the source of each prospective client.

Item 8. Methods of analysis, Investment Strategies and Risk of Loss

PVG's Loss Averse Investing strategies pursue an "absolute" rather than "relative" return objective. Loss Averse Investing does not attempt to outperform market or peer group indices, an objective which generally requires remaining invested at all times regardless of market conditions. PVG attempts to make money during rising markets and to reduce volatility and avoid substantial losses during market declines. Protecting portfolios from a concern the market will fall, could result in lower or even negative returns. There may be market conditions where the securities in a PVG portfolio fall in price and the hedge or inverse ETF also falls in price, resulting in losses that may be as much or more if the portfolio was invested in a market index.

PVG also manages other strategies that perform, more or less, like market indices or otherwise traditional management strategies. Our Value Strategy, for instance, is benchmarked against a peer group of similar strategies. These types of traditional strategies incur both non-systemic risk or individual security risk, and systemic risk or market risk.

PVG also manages Tactical strategies move in and out of markets or asset classes as conditions change. The objective is to reduce portfolio volatility~~,~~ during falling markets, although the approach could also reduce returns of a rising asset were sold too soon.

PVG believes that security prices are determined by future economic conditions, corporate fundamentals, and the supply and demand for securities, all of which are uncertain in the present, but which may be postulated through diligent investment research. Security prices reflect this uncertainty, changing frequently and often to extremes, as institutional and individual investor opinions change, and their willingness to accept risk (valuations) rises and falls. Misreading conditions could result in significant losses.

PVG employs a disciplined investment process designed to capture and profit from secular and cyclical changes in market valuations (trends) that can be anticipated or at least identified.

PVG believes it has greater flexibility to fully exploit market cyclicality or pricing extremes than many money managers. Our investment process does not require meeting different internal institutional demands like tracking market, asset class, or peer-group benchmarks. Our decisions are not limited to a single asset class, an investment selection style, or by trading restrictions. We make decisions with limited concern for tax implications. Unlike most managers, we use hedging techniques to protect assets from market declines. Our size, organizational structure, and technology allow us to take advantage of market cyclicality without moving market prices in the process.

PVG's investment process encompasses top-down and bottom-up economic and corporate fundamental research, and technical analysis. Some of our strategies incorporate only technical analysis. For instance, we utilize a technical algorithm predicated on Moving Averages of the S&P 500 Index or other indices to signal trades in select strategies.

Security selection and management tactics reflect our economic and business views. They are also based on field proven research, including the research and experience of our investment professionals.

A common fundamental emphasis of this research is identifying sustainable and improving sales and earnings growth rates and rising corporate returns on equity, based on new products, management, and other events. A common technical emphasis is on market leadership, institutional sponsorship, and identifying changing supply and demand for asset classes, market sectors, and individual securities.

PVG managers continuously review economic, business and market issues to determine trends, and to confirm or revise our opinions and understand the opinions of others. We continuously review research and price information on a large universe of alternative securities to sort out those most promising for inclusion or sale from portfolios.

Portfolio activity, "turnover", depends upon changing market trends, often over periods of only a few months, as well as corporate fundamentals. We may quickly reverse decisions, even taking losses to avoid further price deterioration. Purchases and sales are contrarian, based on perceived investor overreaction to news. i.e., portfolios are frequently constructed during declining markets, adjusted during rising markets, and liquidated after gains. Fully invested portfolios typically contain between 10 and 50 individual securities or substantially fewer when Exchange Traded Funds are used for sector exposure and diversification.

Rather than liquidate all securities in a portfolio that may be declining because of a weak market, our managers also "hedge" portfolios against negative market conditions. Hedging is accomplished in most cases with the purchase of an Inverse Exchange Traded Fund or a similar mutual fund that effectively "shorts" a market. These inverse securities are designed to move in the opposite direction of the market which they represent, although they may at times differ. There is no certainty that inverse ETF's will work always as expected. As an example, a portfolio's "net long position" or the dollars in an account that are exposed to market risk may range from 100% to 0% without the sale of all securities because of this technique.

PVG solely employs Exchange Traded Funds (ETFs) in the management of some accounts. ETF's are selected using the same techniques as for individual securities. They most often reflect the same decision process as used for individual securities. ETFs are funds that encompass tens to hundreds of securities. While providing diversification, they sometimes will fail to track the price of their underlying securities. Like mutual funds ETF's charge an additional internal management fee.

An investment with PVG may differ from other asset managers in several ways.

1. Investment positions are often taken for shorter term gain potential, even though we research the longer-term attractiveness of a business and investment. When securities are not sold, market risk may be "hedged" using mutual or exchange traded funds that short the market. Hedging may also generate short-term gains or losses, even when markets are moving in an opposite direction. In addition, PVG employs stop losses to avoid risk. Sold or similar stocks may be repurchased if market conditions or our judgment changes.

2. PVG uses all asset classes, including larger and smaller companies by capitalization and international securities, and all styles of security selection in portfolios, including securities often identified as growth and value, and may also use equity or fixed income security derivatives like exchange traded funds. PVG may also utilize individual bond holdings in some accounts that may contain non-investment grade bonds. Portfolios may be more concentrated by industry or market sector than other managers that track typical asset classes or market benchmarks. While this may involve additional risk, it also can avoid performance dilution from lagging groups and sectors.

3. Technical analysis is a component of our management, although we rigorously engage in qualitative and quantitative fundamental economic, business, and corporate research. Behavioral reasons, as indicated by technical measures, are often the reason for the sale of companies or asset classes that continue to have attractive business prospects.

4. Management may pass up the potential for higher returns by selling securities during rising markets in order to protect client assets or limit risk. We may choose to hold money market funds instead of stocks or hedge market risk in a rising but risky market, rather than risk a reversal and capital losses. As a result, PVG clients are subject to greater management decision risk than investors who remain fully invested in diversified portfolios where market risk is greater.

5. Our management process may reduce but does not eliminate portfolio sensitivity to a declining market. As with all money management, the future is uncertain and results depend heavily on the skill of the investment professionals making decisions. There is no guarantee of results, returns or past performance. This is particularly true after longer periods of rising stock and bond prices.

Item 9. Disciplinary Information

PVG is not subject to any disciplinary actions. None of PVG's principals or corporate management is subject to any criminal charges. None has ever been convicted of any criminal activity.

Item 10. Other Financial Industry Activities and Affiliations

PVG management and employees invest significant amounts of their own liquid net worth in PVG managed accounts, and these individuals may have investments in other non PVG investments such as real estate, cattle, private companies, and other non-traditional assets.

Item 11. Code of Ethics

PVG has adopted written **Policies and Procedures** setting forth standards of conduct expected from corporate personnel. These Policies and Procedures specifically address such issues as Client Privacy, Proxy Voting, and Personal Securities Trading practices.

Complete copies of these Policies are presented to the client at the inception of the account and/or the signing of any management agreement.

PVG recognizes that its customers have an expectation that PVG and its affiliates will maintain the confidentiality of customers' nonpublic personal information. Nonpublic personal information about clients is collected for purposes of managing and administering the client relationship with us.
This information is not for resale or transfer to unaffiliated parties and is shared with third parties only to allow us to manage, trade, and administer the account.

PVG may collect information furnished by clients such as client name, address, social security number and beneficiary designation on forms required to establish the accounts with PVG and affiliated companies. This information may contain specific details concerning the assets in the account and including records of transactions in assets transferred from another financial institution.

Expressly for the purpose of managing and administering the account, PVG may disclose both identification and transaction information to affiliated and nonaffiliated parties such as brokers, transfer agents, mutual fund companies, administrators, or other representatives of the seller or purchaser of assets or a firm that provides valuations for securities. PVG does not disclose nonpublic personal information about clients to any party, except as directed by client and permitted by law. PVG has installed safeguards to ensure client nonpublic personal information is used by these organizations only for the purpose provided. PVG maintains records on secured computers. All employees are advised of PVG's privacy policies and of the confidential nature of the information they handle.

PVG principals or employees may invest in the same securities as its clients. Securities purchased by employees are in most cases in accounts managed by PVG as any other clients and are entered as trades at the same time as for other client accounts. Employees may not purchase or sell any security in advance or with knowledge that similar action will be taken by the firm. All employee trades are reviewed for consistency with PVG's code of ethics on a quarterly basis.

Item 12. Brokerage Practices

To the extent PVG invests in stocks, bonds, and mutual funds, commissions or other transaction costs are paid from the client account to the broker/dealer/custodian. PVG does sponsor a Wrap program where the investment advisory fees and all costs are bundled into one fee paid by the customer.

Many PVG accounts are "directed", and as such are traded exclusively with the financial consultant/advisor or broker/dealer responsible for the introduction of the account to PVG. PVG may not be authorized to negotiate commissions and may not be able to obtain volume discounts in this situation as opposed to clients that are not directed. A disparity in commission charges may exist between the commissions charged to clients who direct PVG to use the above-named broker/dealer and other clients who do not direct PVG to use said broker dealer. PVG does not share in any commissions.

To the extent PVG may invest accounts in funds managed by other firms; these funds may pay a management fee to their respective managers that are deducted from each fund's income. These fees are an indirect expense to client accounts. PVG may also from time to time make investments in certain funds where redemption, transaction, or 12b(1) fees may be levied against the client account by the Fund Company or by the Account Custodian. PVG does not share in any of these fees.

PVG may execute undirected institutional security trades through broker dealers other than their custodian to achieve "Best Execution". PVG considers the following factors or combination of factors when determining the broker dealer with which to trade: 1.) commission cost per share; 2.) timeliness and quality of the firm executing the trade; 3.) market impact of the trade including the broker's order flow in the particular security or whether or not the broker "makes a market" in the security; and 4.) any research that a firm may provide to PVG.

Soft Dollars: Some accounts managed by PVG generate "soft dollars", whereby the broker executing a trade will pay for services for the benefit of all PVG clients based on the volume of commission business conducted. A benefit typically is research or other services provided that can be used by PVG managers for the benefit of clients.

PVG makes decisions involving "soft dollars" in a manner that satisfies safe harbor requirements provided by Section 28(e) of the Securities Exchange Act of 1934. Under specified conditions, PVG is permitted to utilize a portion of commission dollars generated by trades to pay for investment research and brokerage products and accounting services. If Applicant were to obtain a product (or service) for both research and non- research purposes, it directs payment of only that portion of the cost attributable to research use with soft dollars. Applicant's interest in making such allocations may differ from clients' interest in that Applicant has an incentive to designate as great a portion of the cost as "research" as possible in order to permit payment with "soft dollars".

PVG allocates transactions to broker-dealers for execution on such markets and at interest of the client, taking into consideration primarily available prices and then brokerage commission rates, and other relevant factors such as, the broker-dealer's execution capability, the size of the transaction, the difficulty of execution, the operational facilities of the broker-dealer involved, the risk in positioning a block of securities, the quality of the overall brokerage and research services provided by the broker-dealer, and the value of an ongoing relationship with such broker- dealers without having to demonstrate that such factors are of a direct benefit to a client. PVG may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction if PVG determines in good faith that the amount of commission is reasonable in relation to their value of the services provided by the broker-dealer, viewed in terms of either the particular such prices and commission rates as in its good faith judgment are in the best transaction or PVG's overall responsibilities with respect to the account over which it exercises investment discretion.

Applicant may use a client's "soft dollars" to acquire research and other services and products in support of investment decisions for accounts other than the particular account whose transactions generate the commissions.

Item 13. Review of Accounts and Other Matters

Client accounts are generally reconciled daily against custodian records and reviewed daily by the investment staff. Accounts, other than custom accounts, generally hold the same investment positions, based on objective. If a position is bought and sold in one of these accounts, it is typically bought and sold in all accounts with the same objective, except in unusual circumstances.

Clients receive electronic and printed communication from their respective broker/dealer custodians at least monthly. In addition, PVG provides printed or electronic quarterly statements and performance reports, depending upon the request of clients and/or their investment advisor or broker of record.

Liquidity and Distributions: Investors in separate accounts may withdraw their funds at any time without penalty or establish periodic distributions.

Investors in other “funds” outside of PVG are subject to the rules of such fund.

Communication: Daily, monthly, quarterly, and annual communication concerning economic and market conditions and other subjects is provided by public mail, the internet, and email, as well as by telephone and personal contact. Valuations, performance, and tax reporting are provided as required. Broker/dealer/custodian web sites generally provide clients the ability to view their accounts on a daily basis via websites. Frequency of personal contact may depend upon the requirements of each client as negotiated with PVG.

Performance is reported by group or objective and is calculated on a time and dollar weighted basis (TWR) by third party Advent AXYS software for both separate account and Fund investors. Performance is available on both a net of fees and expenses and gross basis.

No model or hypothetical portfolios are used to represent reported performance. Reported performance represents the results of the PVG management team. PVG changed the methodology of their Dynamic Core strategy in 2015 and has an audited record of a back tested model of the new methodology.

Item 14. Client Referrals and Other Compensation

PVG may at times pay solicitors with solicitor agreements for referring accounts to the firm.

Item 15. Custody

PVG has no custody of client's cash, bank accounts or securities with regard to advisory accounts. We do not act as trustees on accounts, nor are we a qualified custodian for clients in connection with advisory services provided. PVG acts solely under a limited power of attorney that allows it to manage a client’s account and, in some cases bill, a client’s custodian for account management per contract. Each client’s individual custodian provides asset protection and account data, including statements, that should be compared with any provided by PVG for accuracy.

Item 16. Investment Discretion

Clients engage PVG with an advisory agreement that includes a power of attorney allowing PVG to buy and sell securities in its discretion. Combined with the appropriate custodian/broker dealer documentation, PVG has the discretion to manage any account in a manner deemed appropriate by PVG. PVG or the custodian/broker dealer provides all contracts and agreements for client signature. PVG returns to each client its contracts and agreements with a right of rescission.

PVG has some clients that do not allow the Company investment discretion. As a convenience to clients, those clients who have assets in the account they do not want to sell, may designate these assets to be separated into a "non-managed" and sometimes "non-billed" portion of their account. Any client doing so retains responsibility for these specific assets, although continue to be tracked on our portfolio management software. PVG also acts a portfolio manager or model manager to Wrap Sponsored accounts or private funds where we provide trades to the Wrap Sponsor. The Wrap Sponsor will execute the trades on behalf of the client and therefore PVG does not technically have discretion, but these clients are included in PVG's trade rotation in timing of when the model is sent to the plan sponsor for execution.

Item 17. Voting Client Securities

Clients are required to designate their intention to vote their own security proxies on the chosen custodian's documentation. If they choose to vote their own proxies, they will receive the documentation directly from the transfer agent or custodian.

On behalf of its clients, PVG will accept authority to vote client securities. PVG acquires and holds a company's securities in the portfolio it manages in the expectation of profit. The ability and judgment of management is critical to the investment success of any company. Therefore, PVG will generally not hold securities of companies whose management it questions. As such, PVG casts most of its proxy votes, particularly on routine matters, such as the slate of director nominees, ratification of accountants, changing corporate names and similar matters, in accordance with management recommendations, subject to SEC rule 206(4)-6. PVG does not anticipate conflicts of interest between itself and clients with respect to the voting of securities since we typically own the same securities as our clients or do not own any related securities. Clients may obtain a copy of our voting policies and procedures as well as our voting record upon request.

Item 18. Financial Information

PVG is not subject to any financial reporting requirements that would impact the continuation of its business operations.

Item 19. Requirements for State-Registered Advisers

PVG is federally registered Investment Adviser. All licensed Investment Adviser Representatives associated with PVG Asset Management Company, have their Form ADV Part 2B's on file in the Centennial office as well as in the Florida and Michigan locations.