

Item 1 - Cover Page

## **G5 Financial Group Wrap Program**

**G5 Financial Group RIA, LLC  
5613 DTC Parkway, Suite 1200  
Greenwood Village, CO 80111  
P: 303-721-0691  
[www.G5FinancialGroup.com](http://www.G5FinancialGroup.com)**

**January 30, 2013**

**This wrap fee program brochure provides information about the qualifications and business practices of G5 Financial Group RIA, LLC. If you have any questions about the contents of this Brochure, please contact us at (303) 721-0691 and/or [madrian@g5financialgroup.com](mailto:madrian@g5financialgroup.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 G5 Financial Group RIA, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Any references to G5 Financial Group RIA, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

## **G5 Financial Group RIA, LLC**

### **Item 2 - Material Changes**

\*\*\*\*\*

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was June 17, 2011.

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing dis-closure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Lowell Adrian at (303) 721-0691 and/or ladrian@g5financialgroup.com. Additional information about G5 Financial Group RIA, LLC is also available via the SEC's website [www.adviser.sec.gov](http://www.adviser.sec.gov). The website also provides information about any persons affiliated with G5 Financial Group RIA, LLC who are registered, or are required to be registered, as investment adviser representatives of G5 Financial Group RIA, LLC.

# **G5 Financial Group RIA, LLC**

## **Item 3 – TABLE OF CONTENTS**

Item 1 – Cover Page.....	Cover Page
Item 2 - Material Changes .....	2
Item 3 – TABLE OF CONTENTS .....	3
Item 4 - Services, Fees and Compensation .....	4
Wrap Fees .....	5
Item 5 - Account Requirements and Types of Clients .....	7
Item 6 - Portfolio Manager Selection and Evaluation .....	7
Item 7 - Client Information Provided to Portfolio Managers .....	9
Item 8 - Client Contact with Portfolio Managers .....	9
Item 9 - Additional Information.....	9
Participation or Interest in Client Transactions and Personal Trading .....	10
Code Of Ethics .....	11
Review of Accounts .....	11
Brokerage Practices .....	12
Client Referrals and Other Compensation .....	14

## **G5 Financial Group RIA, LLC**

### **Item 4 - Services, Fees and Compensation**

Within G5 Financial's managed assets program G5 Financial offers several options and access to several custodians through which G5 Financial is able to manage your portfolio.

Wrap programs may be more expensive to clients where there is less trading or where a buy and hold strategy is applied. Typically wrap program fees are higher since the investment adviser needs to charge a fee to cover its management as well as transaction costs. Additionally, if an investment adviser utilizes non-transactional securities in the management of the account the investment adviser will benefit since the investment adviser will not need to pay transaction fees out of the fee received from the client. Wrap programs may appear more beneficial upon initiation of the account management when there may be more trading or when the account is rebalance or re-allocated since the client will not need to pay transaction fees.

Alternatively, non-wrap programs (i.e. programs where the client pays a fee for asset management and pays transaction fees for transactions occurring in the account) may be more expensive if there are many transactions occurring in the account, if the investment adviser utilizes securities that have a transaction fee, if there is steady rebalancing and frequent reallocation of the account. Alternatively, a non-wrap program will be more beneficial to a client where a buy and hold strategy is applied, where no transaction fee funds are used or there is infrequent transactions. Clients will typically pay a lower fee since the investment adviser will not need to pay for transaction fee costs out of the fee.

G5 Financial has created various model portfolios designed around various investment objectives and risk profiles. G5 Financial's management program is geared around managing clients accounts based on its models.

Upon G5 Financial completing its analysis of your situation, G5 Financial will select one or more model portfolios to invest your portfolio. G5 Financial customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

G5 Financial will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, G5 Financial will implement the portfolio allocation.

G5 Financial will provide continuous and ongoing management of your account based on the models. Therefore, if a change is made to a model portfolio that change is applied universally across all client accounts invested to the model. There is no consideration given your personal tax situation.

G5 Financial will manage the account on a discretionary basis and will make changes to the allocation as deemed appropriate by G5 Financial. G5 Financial will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. G5 Financial may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to G5 Financial by execution of the Asset Management agreement.

## G5 Financial Group RIA, LLC

G5 Financial primarily uses open-ended mutual funds (no-load and load waived or mutual funds purchased at net asset value (NAV)) and exchange traded funds (ETFs). However, managed accounts are not exclusively limited to mutual funds and ETFs and may include stocks and bonds which are typically transferred or requested by you.

You are advised transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

### Wrap Fees

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account, provided the Account continues to meet minimum account size requirements. Additional assets deposited into the Account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the then current three month period. Additionally, partial withdrawals from the account will result in a prorated portion of the fee being credited to the Account. No fee adjustments will be made for Account appreciation or depreciation.

The fee schedule is progressive and tiered. Therefore, each threshold of assets will be charged the correspondence fee. Please refer to Example I below.

Account Size	Annual Fee
First \$100,000	2.00%
Next \$150,000	1.80%
Next \$250,000	1.40%
Next \$500,000	1.10%
Next \$1,000,000	1.00%
Next \$3,000,000	0.75%
Next \$5,000,000 and over	Negotiable

G5 Financial aggregates or households all of your managed accounts together to determine your quarterly fee.

#### Example

If you have four managed accounts with a value as of the just completed calendar quarter of: \$401,569.40, \$55,498.46, \$675,879.50, and \$74,301.12 with a total value of \$1,207,248.48, your quarterly fee will be calculated as follows:

First \$100,000 x 2%	=	\$2,000
Next \$150,000 x 1.80%	=	\$2,700
Next \$250,000 x 1.40%	=	\$3,500
Next \$500,000 x 1.10%	=	\$5,500

## G5 Financial Group RIA, LLC

$$\begin{array}{r} \text{Balance } \$207,248.48 \times 1\% = \$2,072.48 \\ \hline \$1,207,248.48 \qquad \qquad \qquad \$15,772.48 \text{ annually} \end{array}$$

### Quarterly Fee Calculation

$$\begin{array}{l} \$15,772.48 / 365 \text{ (days in a year)} = \$43.21 \text{ daily rate} \times 92 \text{ (\# days in a quarter)} = \\ \$3,975.53 \text{ quarter fee} \end{array}$$

G5 Financial may change the above fee schedule upon 30-days prior written notice to you.

Advisory fees will generally be collected directly from your account, provided you have given G5 Financial written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, G5 Financial has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to G5 Financial, except for ERISA and IRA accounts.

In addition to the advisory fees above, you will pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by G5 Financial and are charged by the product, broker/dealer or account custodian. G5 Financial does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with G5 Financial and are compensation to the fund-manager.

Certain mutual funds can be conducted with no transaction fees. Therefore, there is an incentive for G5 Financial to utilize funds for which the broker/dealer will not assess a transaction fee to G5 Financial. Therefore, G5 Financial's account costs are reduced. The funds available with no transaction fees may vary from broker/dealer to broker/dealer. Further, funds purchased with no transaction fees will typically need to be held for 60 to 90 days to avoid any early redemption charges being assessed. G5 Financial does not give consideration to the funds that have no transaction fees when selecting funds for the models. The investment committee has no incentive to select funds with no transaction fees over another. The securities selected in the model accounts are selected based on performance among their peers.

Advisory fees will be charged in advance of each calendar quarter. The quarterly advisory fee will be based on the value of the Account on the last business day of the just completed calendar quarter. Fees for partial period will be prorated. The initial quarterly fee will be a pro-rated portion of the fee based on the number of days remaining in the calendar quarter. The initial fee will be charged at the end of the partial calendar quarter along with the next quarterly fee paid in advance. The initial fee will be based upon the value of the account upon account establishment.

You are advised Advisory Representatives of G5 Financial are dually registered representatives of Gēneos Wealth Management, Inc. ("Gēneos"), a registered broker/dealer, member of the Financial Regulatory Association (FINRA) and SIPC. Advisory Representatives may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through Gēneos. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1

## **G5 Financial Group RIA, LLC**

fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees may be initially paid to Gēneos and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As stated above, G5 Financial recommends mutual funds that pay 12b-1 fees and no-load funds.

You may purchase the securities recommended by G5 Financial directly or through other brokers or agents not affiliated with G5 Financial.

### **Termination Provisions**

You may terminate investment advisory services obtained from G5 Financial, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with G5 Financial. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate investment advisory services with 30-days written notice to G5 Financial. Should you terminate investment advisory services during a calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the calendar quarter.

### **Item 5 - Account Requirements and Types of Clients**

G5 Financial's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth individuals as well as trusts and estates.

G5 Financial generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining asset management services. To participate in G5 Financial's Asset Management services, managed accounts will need to be opened with at least \$100,000 (cash or securities). However, under certain circumstances, G5 Financial may waive the minimum account size requirement and accept accounts less than \$100,000. Such circumstances may include but not be limited to additional assets will soon be deposited or you have other accounts under management with G5 Financial. You are advised performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised. Performance of smaller accounts may vary from the performance of accounts with more dollars invested due to fluctuations in the market may affect smaller accounts more and the effects of compounding may be greater in larger accounts.

### **Item 6 - Portfolio Manager Selection and Evaluation**

Portfolio managers are the Advisory Representatives under G5 Financial. Managed portfolios are managed internally by G5 Financial. Therefore, G5 Financial will not hire separate account managers to manage your wrap account.

G5 Financial offers the following advisory services. Each of the services is more fully described below.

## **G5 Financial Group RIA, LLC**

- Asset Management
- Financial Planning and Consulting Services

Financial Planning and Consulting Services are tailored to your individual needs. However, Asset Management services are provided based on managed models. As further described below, a model portfolio(s) will be selected for you and your account managed consistent with the model. You may not impose restrictions and/or limitations on the investing in certain securities or types of securities.

G5 Financial will ask you to complete an account application to assist G5 Financial with obtaining information about your financial situation and history. Additionally, G5 Financial will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information gathered by G5 Financial will assist G5 Financial to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, G5 Financial will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings tendencies
- Other applicable financial information required by G5 Financial in order to provide the investment advisory services requested.

Whether you select a wrap account option or non-wrap account, the management of your account will be treated the same. The difference lies in the pricing structure.

G5 Financial does not charge performance based fees.

G5 Financial conducts economic analysis and attempts to analyze and determine the trends. Additionally, G5 Financial conducts fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by G5 Financial will require you to be prepared to bear the risk of loss and fluctuating performance.

G5 Financial does not represent, warrant or imply that the services or methods of analysis used by G5 Financial can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved.



## **G5 Financial Group RIA, LLC**

Further, no promises or assumptions can be made that the advisory services offered by G5 Financial will provide a better return than other investment strategies.

As stated above in Item 5, G5 Financial primarily uses mutual funds and exchange traded funds. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and fund straying from its objective. Open ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time G5 Financial will direct the client to the appropriate Web page to access the prospectus.

ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.

G5 Financial does not vote clients' securities.

### **Item 7 - Client Information Provided to Portfolio Managers**

Your financial history and information and personal information such as social security number, identify verification information, account numbers, etc. will be gathered and obtained by your Advisory Representative. The aforementioned information will be communicated as required by the account custodian you select to establish your account. Your non-public information will not be disclosed to any third party unless required by law or to provide you services you have requested.

At least annually your Advisory Representative will offer to meet with you to update your personal information, review your account and determine if the management of your account is suitable to your financial situation. Should your financial situation or investment goals or objectives change, you must notify G5 Financial promptly of the changes.

Further, please refer to G5 Financial's privacy policy for additional information about how your personal information will be handled.

### **Item 8 - Client Contact with Portfolio Managers**

There are no restrictions or limitations on your ability to contact your Advisory Representative or any member of the G5 Financial management team of the G5 Financial model portfolios. You along with your Advisory Representative determine the frequency of meetings and reviews.

### **Item 9 - Additional Information**

There is no reportable disciplinary information required for G5 Financial or its advisory representative that would be deemed material to your evaluation of the advisory services offered by G5 Financial or the integrity of G5 Financial, its principal owners or your Advisory Representative.

## **G5 Financial Group RIA, LLC**

G5 Financial will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.

### **Participation or Interest in Client Transactions and Personal Trading**

G5 Financial and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, G5 Financial and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. G5 Financial and its associated persons will not put their interests before your interests. G5 Financial and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you.

G5 Financial is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of client transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. G5 Financial and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

G5 Financial has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) Advisory Representatives shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her affiliation with the G5 Financial or G5 Financial, unless the information is also available to the investing public on reasonable inquiry. No person shall prefer his or her own interest to that of the advisory client. (1) (2)
- 2) All clients are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.
- 3) G5 Financial emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where a Third Party Advisory Service is granted discretionary authority in the client's account.
- 4) G5 Financial requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- 5) Any individual not in observance of the above may be subject to termination.

### **Footnotes**

- (1) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of the G5 Financial's client's trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with the G5 Financial's records in the manner set forth above.

## **G5 Financial Group RIA, LLC**

- (2) Open-end mutual funds and/or the investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds and/or variable insurance products by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by the G5 Financial's Investment policies and procedures.

In accordance with Section 20A of the Investment Advisers Act of 1940, the G5 Financial also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the G5 Financial or any person associated with the G5 Financial.

### **Code Of Ethics**

G5 Financial has a fiduciary duty to act in the best interest of you and always place your interests first and foremost. G5 Financial takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as G5 Financial's policies and procedures. Further, G5 Financial strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with G5 Financial's Privacy Policy. As such, G5 Financial maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about client transactions. Further, G5 Financial's Code of Ethics establishes G5 Financial's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

### **Review of Accounts**

You will be invited to participate in not less than an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

The following individuals conduct reviews:

Lowell Adrain, Advisory Representative  
Scott Forsyth, Advisory Representative

You are advised you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require a review of your portfolio allocation and potential changes.

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. Additionally, G5 Financial will provide you with a consolidated report of your managed account on a quarterly basis. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

## **G5 Financial Group RIA, LLC**

### **Brokerage Practices**

Advisory Representatives are registered representatives of Gëneos. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from Gëneos unless Gëneos provides him with written authorization. Advisory Representatives have obtained approval to offer you the ability to maintain accounts through Gëneos at its clearing firm, Pershing, LLC or National Financial Services LLC. G5 Financial is independently owned and operated and not affiliated with Fidelity or Gëneos.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by G5 Financial will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from G5 Financial.

In initially selecting Gëneos, G5 Financial conducted due diligence. G5 Financial's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to G5 Financial
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

Additionally, periodically G5 Financial will review transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

You are advised there is an incentive for G5 Financial and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

### Fidelity

## **G5 Financial Group RIA, LLC**

The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist G5 Financial in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help G5 Financial manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom G5 Financial may contract directly.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Fidelity is providing G5 Financial with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

### Gěneos

Gěneos has a wide range of approved securities products for which Gěneos performs due diligence prior to selection. Gěneos' registered representatives are required to adhere to these products when implementing securities transactions through Gěneos. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Gěneos also provides Advisory Representatives, and therefore the G5 Financial, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and G5 Financial manage and further develop its business enterprise.

Gěneos and its clearing broker/dealer, Pershing, LLC also make available to G5 Financial other products and services that benefit G5 Financial but may not directly benefit you. Some of these other products and services assist G5 Financial with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of G5 Financial's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of G5 Financial's accounts, including accounts not held through Gěneos.

## **G5 Financial Group RIA, LLC**

### Trade Aggregation Policy

G5 Financial may aggregate (“bunch”) transactions in the same security on behalf of more than one client in an effort to strive for best execution and to possibly reduce the price per share and/or other costs to clients. However, aggregated or bunched orders will not reduce the transaction costs to participating clients. G5 Financial conducts aggregated transactions in a manner designed to ensure that no participating client is favored over another client. Participating clients will obtain the average share price per share for the security executed that day. To the extent the aggregated order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated on a random basis. Under certain circumstances, the amount of securities maybe increased or decreased to avoid holding odd-lot or a small number of shares for particular clients.

### **Client Referrals and Other Compensation**

Product vendors recommended by G5 Financial may provide monetary and non-monetary assistance with client events, provide educational tools and resources. G5 Financial does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. G5 Financial’s due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and G5 Financial.

G5 Financial does not directly or indirectly compensate any person who is not a supervised person of G5 Financial for referrals. Further, G5 Financial does not receive an economic benefit from a non-client for providing investment advice or advisory services to you.