

**Part 2A of Form ADV: *Firm Brochure***

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01/01/2017

This brochure provides information about the qualifications and business practices of McGill Advisors. If you have any questions about the contents of this brochure, please contact us at 866-727-6100 or [bmiller@mcgilladvisors.com](mailto:bmiller@mcgilladvisors.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. McGill Advisors, Inc. is a registered investment adviser. Registration itself, however, does not require any particular level of skill or training.

Additional information about McGill Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 111093.

**Item 2 MATERIAL CHANGES**

We have not made material amendments to this Disclosure Brochure since our last annual updating amendment filing.

<b>Item 3</b>	<b>TABLE OF CONTENTS</b>	<b>Page</b>
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	6
Item 7	Types of Clients	6
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	10
Item 13	Review of Accounts	13
Item 14	Client Referrals and Other Compensation	13
Item 15	Custody	13
Item 16	Investment Discretion	13
Item 17	Voting Client Securities	14
Item 18	Financial Information	14

#### **Item 4     ADVISORY BUSINESS**

McGill Advisors, Inc. ("McGill Advisors") is an SEC-registered investment adviser with its principal place of business located in North Carolina. McGill Advisors began conducting business as an SEC registered investment adviser in 1999. Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Robert V. Sytz, Jr., President, Treasurer, and Chief Executive Officer;
- John K. McGill, Executive Vice President, Secretary and Director of Marketing.

McGill Advisors offers the following advisory services to our clients:

#### **Portfolio Management Services**

McGill Advisors provides Portfolio Management Services to clients through customized investment portfolios. In other words, we provide on-going advice to the client regarding investment of the client's assets based on the individual needs of the client.

Through personal discussions in which goals and objectives based on a client's particular circumstances are established, McGill Advisors develops a client's personal asset allocation and creates and manages the portfolio based on that allocation. We offer Portfolio Management Services on a discretionary basis only. Account supervision is guided by the stated investment goals and risk tolerance of the client (i.e., maximum capital appreciation, growth, income, or growth and income).

We will create the client's portfolio of one or more of the following, as appropriate: individual equities, bonds, notes and other fixed income instruments, options, no-load or load-waived mutual funds, Exchange Traded Funds (ETFs) and/or other investment products. We will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. Mutual funds, ETFs and other funds are selected on the basis of any or all of the following criteria as they relate to the security or its underlying index: performance history; industry sector; track record; investment objectives; composition and focus and fee structure and expenses. Portfolio weighting will be determined by each client's individual needs and circumstances as communicated to and documented by McGill Advisors. Clients will retain individual ownership of all securities.

While we do not hold McGill Advisors out as providing financial planning services, as part of our Portfolio Management Service we do offer some basic financial planning recommendations to clients during regular meetings. McGill Advisors does not receive any additional compensation for these recommendations beyond its portfolio management fee (as discussed below), nor do we provide a comprehensive written financial plan to the client. Since the majority of our clients are small business owners with retirement plans, McGill Advisors typically provides the trustee(s) of such plans with specific recommendations for their company sponsored retirement plans. On occasion and when requested by a client, an investment adviser representative (IAR) of McGill Advisors will consult with a client's employees participating in a plan, the assets of which (or a portion thereof) are managed by McGill Advisors.

### **Amount of Managed Assets**

As of 12/31/2016, we were actively managing \$1,360,000,000 of clients' assets on a discretionary basis.

### **Seminars**

McGill Advisors provides educational seminars on various wealth topics that may include retirement planning, investment planning, or other similar topics at the request of the seminar sponsor. The investment information provided under this service is educational in nature and does not purport to meet the objectives or needs of any particular attendee. McGill Advisors seminars are typically sponsored by and provided for select groups or organizations but may also be open to the public. Seminars present an opportunity to introduce our firm to people who may benefit from our services. As such, we do not typically charge fees for presenting seminars. In addition, we frequently donate time and materials and may assume other expenses related to a seminar sponsored by a third party. Seminar sponsors may reimburse us for reasonable expenses.

## **Item 5 FEES AND COMPENSATION**

### **Portfolio Management Services**

The annual fee for Portfolio Management Services will be charged as a percentage of assets under management. The fee will be determined and quoted prior to the inception of the relationship and will be based on the work required, complexity and frequency of client meetings and conference calls. Listed below is McGill Advisors' basic fee schedule, based on a percentage of client assets under management. This schedule is used by McGill Advisors as a guide in determining the fee to be charged to the client. This fee schedule is negotiable, in McGill Advisors' sole discretion, based upon the factors listed above.

<u>Assets under management</u>	<u>Annual Fee (%)</u>
\$300,000 - \$1 million	1.00%
\$1,000,001 - \$2 million	0.85%
\$2,000,001 - \$3 million	0.75%
\$3,000,001 - \$5 million	0.65%
\$5,000,001 - \$7 million	0.55%
\$7,000,001 - \$10 million	0.45%
\$10,000,001 +	0.35%

We generally require a minimum account size of \$300,000 or a minimum annual fee of \$3,000 for this service. However, under certain circumstances, this minimum, as well as all fees, may be negotiable. We may group certain related client accounts for the purposes of achieving the minimum account size and determining the annual fee.

Clients will be invoiced in advance at the beginning of each 3 month invoicing period based upon the market value of the client's account at the end of the previous quarter, plus any credit balance or minus any debit balance.

## **GENERAL INFORMATION**

***Negotiability of Advisory Fees:*** Although McGill Advisors has established the aforementioned fee schedule, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule will be identified in the agreement between the adviser and each client. In addition, certain existing clients have engaged McGill Advisors under previously applicable fee schedules which are generally lower and/or contain different breakpoints than those disclosed above. These legacy fee schedules are no longer offered or available to new clients.

Discounts, not generally available to our advisory clients, may be offered to family members and personal acquaintances of the associated persons of our firm.

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

***Mutual Fund and ETF Fees:*** All fees paid to McGill Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange-traded funds (ETFs) to their shareholders, including funds purchased for the client's account by McGill Advisors and those previously owned and transferred into the client's McGill Advisors account. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee or surrender charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial situation and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this brochure for additional information.

***Advisory Fees in General:*** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

### **Item 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

McGill Advisors does not charge performance-based fees to any client.

### **Item 7 TYPES OF CLIENTS**

McGill Advisors provides advisory services to individuals, including high net worth individuals, pension and profit sharing plans, trusts, estates, corporations and other businesses.

As disclosed at Item 5 above, we generally require a minimum account size of \$300,000 or a minimum annual fee of \$3,000 for establishing and for maintaining a Portfolio Management Services account. However, under certain circumstances, this minimum, as well as all fees, may be negotiable.

## **Item 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### ***Methods of Analysis***

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

***Fundamental Analysis.*** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

***Technical Analysis.*** We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not primarily consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

***Asset Allocation.*** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

***Mutual fund and/or ETF Analysis.*** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other fund in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the

risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable of the client's portfolio.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

### ***Investment Strategies***

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases.** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Option Writing.** We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts. As a strategy, McGill Advisors does not buy puts and will generally only utilize covered calls. We use "covered calls", in which we sell an option on a security you own. In this strategy, the client receives a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price. This is typically employed when we have a short-term neutral view on the asset.

**Risk of Loss.** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

## **Item 9    DISCIPLINARY INFORMATION**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Neither our firm nor any of our management personnel have any reportable disciplinary events to disclose.

## **Item 10    OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**



Mr. John K. McGill, Executive Vice President, Secretary, Director of Marketing and Investment Adviser Representative of McGill Advisors, in his individual capacity, is a Principal, Certified Public Accountant, and 50% Shareholder of John K. McGill & Co., Inc. (hereinafter "JKM"), a tax and business planning firm. Mr. McGill is also 50% Shareholder of McGill & Hassan, P.A. (hereinafter "M&H"), a law firm.

JKM and M&H may recommend McGill Advisors to their respective clients in need of advisory services. McGill Advisors may recommend JKM and M&H to advisory clients in need of accounting, tax or business planning or legal services, as appropriate. Tax and business planning and legal services provided by JKM and M&H are separate and distinct from the advisory services of McGill Advisors, and are provided for separate and typical compensation. There are no referral fee arrangements between McGill Advisors and JKM and M&H for these recommendations. (However, please refer to Item 14 of this brochure for additional information). No McGill Advisors client is obligated to use JKM or M&H for any tax or business planning or legal services, and no JKM and M&H client is obligated to use McGill Advisors for any advisory services. JKM and M&H's tax and business planning and legal services do not include the authority to sign checks or otherwise disburse funds on any McGill Advisors advisory client's behalf.

While Mr. McGill endeavors at all times to put the interest of the clients first as part of McGill Advisors' fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may unknowingly affect Mr. McGill's judgment of when making recommendations.

Mr. McGill may spend up to 80% of his time on these non-McGill Advisors activities.

## **Item 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

McGill Advisors and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

McGill Advisors' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by sending your written request to our principal office address set forth on the cover page to this brochure or by calling us at 866-727-6100.

McGill Advisors and individuals associated with our firm are prohibited from engaging in principal

transactions. McGill Advisors and individuals associated with our firm are also prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

It is possible that individuals associated with McGill Advisors could buy or sell securities identical to, or different from, those recommended to customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is our expressed policy that no person employed by McGill Advisors may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations present potential conflicts of interest, we have established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) No director, officer or employee of McGill Advisors shall buy or sell securities for their personal portfolio(s) when their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of McGill Advisors shall prefer his or her own interest to that of the advisory client.
- 2) McGill Advisors maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by the President, Chief Compliance Officer, and the Director of Portfolio Management.
- 3) McGill Advisors emphasizes the unrestricted right of the client to decline to implement any advice rendered.
- 4) McGill Advisors 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 disciplinary action up to and including termination.

## **Item 12    BROKERAGE PRACTICES**

### **Portfolio Management Services**

We do not accept the discretionary authority to determine the broker dealer to be used for client portfolio transactions or the commission rates to be paid on a trade-by-trade basis. As such, clients must direct us as to which broker dealer to use for trades placed in the client's account. We request that clients direct us to use Charles Schwab & Company, Inc. ("Schwab") or TD Ameritrade, Inc. (TD Ameritrade), each an SEC registered, FINRA-member broker dealer unaffiliated with McGill Advisors, for custody and brokerage services related to the client's account.

McGill Advisors has evaluated Schwab and TD Ameritrade and believes that either firm can provide our clients with a blend of execution services, commission costs and professionalism that will assist McGill Advisors in meeting its fiduciary obligations to clients.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than Schwab or TD Ameritrade. In directing the use of Schwab or TD Ameritrade, it should be understood that McGill Advisors will not have authority to negotiate commissions on a trade-

by-trade basis or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, clients directing the use of one of these two brokers may incur different commission charges, depending on the security traded, than clients directing the use of the other of the two brokers. This may result in higher costs to the client than may otherwise be obtained if we accepted brokerage discretion. Clients should note, while McGill Advisors has a reasonable belief that both Schwab and TD Ameritrade are able to obtain competitive prices, McGill Advisors will abide by the client's brokerage instructions and will not independently seek best execution price capability through other broker dealers on a trade-by-trade basis.

McGill Advisors participates in the Schwab Institutional Service Program sponsored by Schwab. Through the program, Schwab provides McGill Advisors with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors at no charge to them so long as a total of at least \$10 million of the advisor's clients' account assets are maintained at Schwab. Schwab's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. Schwab also makes available to us other products and services that benefit McGill Advisors but may not benefit its clients' accounts. Some of these other products and services assist McGill Advisors in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of McGill Advisors' fees from its clients' accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of McGill Advisors' accounts, including accounts not maintained at Schwab. Schwab may also provide McGill Advisors with other services intended to help McGill Advisors manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. The availability of the foregoing products and services to us is not contingent upon McGill Advisors committing to Schwab any specific amount of business (assets in custody or trading). Schwab may also pay for meals and entertainment expenses for our personnel attending conferences or meetings relating to the program or to Schwab's advisor custody and brokerage services. However, the receipt of these benefits at no additional cost to us creates a potential conflict of interest which could influence our recommendation of a broker dealer to our clients.

We also participate in TD Ameritrade's Institutional customer program. Like the Schwab program, there is no direct link between McGill Advisors' participation in the program and the investment advice it gives to its clients. However, McGill Advisors receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services provided without cost to McGill Advisors: duplicate client statements and confirmations; research related products and tools; consulting services; access to a dedicated trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain Institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to McGill Advisors by third party vendors.

TD Ameritrade may also pay for meals and entertainment expenses for our personnel attending conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services. Some of the products and services made available by TD Ameritrade through the program may benefit McGill Advisors but may not benefit its client accounts. These products or services may

assist McGill Advisors in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help McGill Advisors manage and further develop its business enterprise. The benefits received by McGill Advisors or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by McGill Advisors or its related persons in and of itself creates a potential conflict of interest and may indirectly influence our recommendation of TD Ameritrade for custody and brokerage services.

McGill Advisors will block trades where possible and when advantageous to clients. We typically will block trades only when buying a new security or eliminating a security from all accounts. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. McGill Advisors will only be able to block trades for client accounts who direct the use of the same broker. As clients will have directed the use of Schwab or TD Ameritrade, we will rotate or vary the order of brokers through which it places trades for clients on any particular day. When a new client account is invested in a strategy, the trades required to implement that strategy are not typically aggregated with other client account trades placed on the same day.

Clients excluded from blocked trades may receive more or less favorable terms for the transaction and a disparity may exist between the prices paid or received by the client and/or the commission charged to the client and the price paid or received and/or commissions charged to other clients participating in an aggregated trade.

McGill Advisors' block trading policy and procedures are as follows:

- 1) McGill Advisors' policies for the aggregation of transactions shall be fully disclosed in this Form ADV;
- 2) McGill Advisors will not aggregate transactions unless it believes that aggregation is consistent with our fiduciary duty to our clients and is consistent with the terms of McGill Advisors' advisory agreement with each client for which trades are being aggregated;
- 3) No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all McGill Advisors' transactions in a given security on a given business day. Depending on the client's agreement with the custodian/broker, transaction costs will either be shared pro-rata based on each client's participation in the transaction or be based on the number of shares traded for each client;
- 4) McGill Advisors will prepare, before entering an aggregated order, a written statement ('Allocation Statement') specifying the participating client accounts and how it intends to allocate the order among those clients;
- 5) If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement; if the order is partially filled, it will be allocated pro-rata based on the Allocation Statement.
- 6) Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for different allocation is explained in writing and is approved by McGill Advisors' compliance officer no later than one hour after the opening of the markets on the trading day following the day the order was

executed;

7) McGill Advisors' books and records will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought and sold for that account;

8) Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement;

9) McGill Advisors will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation; and

10) Individual advice and treatment will be accorded to each advisory client and no client or account will be favored over another.

Please refer to Item 16 of this brochure for additional information.

### **Item 13 REVIEW OF ACCOUNTS**

#### **Portfolio Management Services**

REVIEWS: While the underlying securities within Portfolio Management Services client accounts are continuously monitored by Jeffrey A. Harrell, Director of Portfolio Management of McGill Advisors, these accounts are reviewed at least semi-annually by the investment adviser representative assigned to the account. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

REPORTS: In addition to the monthly statements and confirmations of transactions that Portfolio Management Services clients receive from their broker dealer, we provide quarterly performance reports.

### **Item 14 CLIENT REFERRALS AND OTHER COMPENSATION**

Currently, it is our policy not to engage solicitors or to pay non-related persons for referring potential clients to our firm. However, we reserve the right to engage such solicitors in the future.

Although McGill Advisors does not compensate any person for client referrals, including internal personnel, the shareholders of McGill Advisors are compensated, in part, based on net profits of the firm. These profits will include revenues generated from existing and new client relationships, some of which may have been referred by the shareholders.

### **Item 15 CUSTODY**

Our firm does not have actual or constructive custody of client accounts.

### **Item 16 INVESTMENT DISCRETION**

McGill Advisors offers portfolio management services on a discretionary basis only. As such, we place trades in the client's account without contacting the client prior to each trade to obtain the client's



permission. Clients give McGill Advisors discretionary authority when they sign an advisory agreement with our firm.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell.

#### **Item 17 VOTING CLIENT SECURITIES**

McGill Advisors maintains a written Proxy Voting Policy & Procedures which reflect our duty as a fiduciary to vote proxies in the best interests of our clients. For ERISA plan clients, if any, proxies are voted solely in the best interests of the plan participants and beneficiaries.

Certain clients have expressly retained proxy-voting authority and in such instances, McGill Advisors has no proxy voting responsibility and may not take any action regarding those clients' proxies. However, we will consult with these clients regarding any particular proxy received, as requested.

In the event of any actual or potential conflicts of interests in the voting of any client proxies, McGill Advisors will make appropriate disclosures to clients and either request that the client vote the proxy(s), abstain from voting or vote the client proxies, depending on the circumstances.

McGill Advisors maintains relevant and appropriate proxy records as part of the firm's Proxy Policy & Procedures.

Our Proxy Policy & Procedures and information about the voting of a client's proxies, where McGill Advisors has proxy voting responsibility, are available to a client upon written request. You may request this information by sending your written request to our principal office address set forth on the cover page to this brochure or by calling us at 866-727-6100.

#### **Item 18 FINANCIAL INFORMATION**

McGill Advisors has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

McGill Advisors has not been the subject of a bankruptcy petition at any time during the past ten years.

**Part 2B of Form ADV: *Brochure Supplement***

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866-727-6100

01/01/2017

This brochure supplement provides information about Robert V. Sytz, Jr. that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Brett S. Miller, Chief Compliance Officer of McGill Advisors, if you did not receive McGill Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Robert V. Sytz, Jr. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2. Educational, Background and Business Experience**

**Name:** Robert V. Sytz, Jr.      **Born:** 1958

### **Education**

- Attended Wofford College from 1977 to 1979.
- Graduated from University of North Carolina at Charlotte in 1982 with a B.S. in Accounting.

### **Business Experience**

- President, Treasurer, Chief Executive Officer, and Investment Adviser Representative of McGill Advisors, Inc. from 12/99 to present.
- Principal and Shareholder of McGill Advisors, Inc. from 12/99 to present.
- Chief Compliance Officer of McGill Advisors, Inc. from 12/99 to 01/15.

### **Professional Designations**

- Certified Public Accountant (CPA), 1984.
- Certified Financial Planner (CFP), 1986

## **Item 3. Disciplinary Information**

- Robert V. Sytz, Jr. has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **A. Investment-Related Activities**

Mr. Sytz is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Mr. Sytz is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

## **Item 5. Additional Compensation**

Robert V. Sytz, Jr. does not receive any economic benefit from a non-advisory client for the provision of advisory services.



Although McGill Advisors does not compensate any person for client referrals, including internal personnel, as a principal and owner of McGill Advisors, Mr. Sytz is compensated, in part, based on net profits of the firm. These profits will include revenues generated from existing and new client relationships, some of which may have been referred by the shareholder.

#### **Item 6. Supervision**

Mr. Sytz is the President and Treasurer, and Chief Executive Officer of McGill Advisors as well as a member of the firm's Investment Executive Committee and Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, CEO, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Miller reviews Mr. Sytz's personal securities transactions and can be reached at (866) 727-6100.

**Part 2B of Form ADV: *Brochure Supplement***

John K. McGill  
McGill Advisors, Inc.  
8816 Red Oak Blvd., Suite 260  
Charlotte, NC 28217  
866-727-6100

01/01/2017

This brochure supplement provides information about John K. McGill that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Brett S. Miller, Chief Compliance Officer of McGill Advisors, if you did not receive McGill Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about John K. McGill is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2. Educational, Background and Business Experience**

**Name:** John K. McGill

**Born:** 1956

### **Education**

- Graduated from Erskine College with a B.S. in 1978.
- Graduated from University of North Carolina at Chapel Hill with a M.B.A. in 1982.
- Graduated from University of North Carolina at Chapel Hill with a J.D. in 1982.

### **Business Experience**

- Executive Vice President, Secretary, and Director of Marketing of McGill Advisors, Inc. from 1/14 to present.
- Vice President of Business Development, Secretary of McGill Advisors, Inc. from 01/08 to 12/13.
- Vice President from 05/04 to present and Investment Adviser Representative of McGill Advisors, Inc. from 07/04 to present.
- Principal and Shareholder of McGill Advisors, Inc. from 05/04 to 10/05 and from 01/08 to present.
- Principal and Shareholder of John K. McGill & Co., Inc. from 04/83 to present.
- Principal and Shareholder of McGill & Hassan, P.A. from 05/89 to present.

### **Professional Designations**

- Tax Attorney
- Certified Public Accountant (CPA), 1982.

## **Item 3. Disciplinary Information**

- John K. McGill has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **A. Investment-Related Activities**

Mr. McGill is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

## B. Non Investment-Related Activities

Mr. McGill, in his individual capacity, is a Principal, Certified Public Accountant, and 50% Shareholder of John K. McGill & Co., Inc. (hereinafter "JKM"), a tax and business planning firm. Mr. McGill is also a tax attorney and 50% Shareholder of McGill & Hassan, P.A. (hereinafter "M&H"), a law firm.

JKM and M&H may recommend McGill Advisors to their respective clients in need of advisory services. McGill Advisors may recommend JKM and M&H to advisory clients in need of accounting, tax or business planning or legal services, as appropriate. Tax and business planning and legal services provided by JKM and M&H are separate and distinct from the advisory services of McGill Advisors, and are provided for separate and typical compensation. There are no referral fee arrangements between McGill Advisors and JKM and M&H for these recommendations.

While Mr. McGill endeavors at all times to put the interest of the clients first as part of McGill Advisors' fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may unknowingly affect Mr. McGill's judgment of when making recommendations.

Mr. McGill may spend up to 80% of his time on these non-McGill Advisors activities.

### Item 5. Additional Compensation

John K. McGill does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Although McGill Advisors does not compensate any person for client referrals, including internal personnel, as a principal and owner of McGill Advisors, Mr. McGill is compensated, in part, based on net profits of the firm. These profits will include revenues generated from existing and new client relationships, some of which may have been referred by the shareholder.

### Item 6. Supervision

Mr. McGill is the Executive Vice President, Secretary and Director of Marketing of McGill Advisors as well as a member of the firm's Investment Executive Committee and Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Miller reviews Mr. McGill's personal securities transactions and can be reached at (866) 727-6100.

**Part 2B of Form ADV: *Brochure Supplement***

Jeffrey A. Harrell  
McGill Advisors, Inc.  
8816 Red Oak Blvd., Suite 260  
Charlotte, NC 28217  
866-727-6100

01/01/2017

This brochure supplement provides information about Jeffrey A. Harrell that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Brett S. Miller, Chief Compliance Officer of McGill Advisors, if you did not receive McGill Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey A. Harrell is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2. Educational, Background and Business Experience**

**Name:** Jeffrey A. Harrell      **Born:** 1976

### **Education**

- Attended American River Community College from 1994 to 1997.
- Graduated from California State University at Sacramento in 2000 with a B.S. in Finance.

### **Business Experience**

- Vice President with McGill Advisors, Inc. from 02/06 to present.
- Director of Portfolio Management with McGill Advisors, Inc. from 07/00 to present.
- Investment Adviser Representative with McGill Advisors, Inc. from 12/00 to present.
- Principal and Shareholder of McGill Advisors, Inc. from 01/10 to present.

### **Professional Designations**

- Chartered Financial Analyst (CFA), 2003.

## **Item 3. Disciplinary Information**

- Jeffrey A. Harrell has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **A. Investment-Related Activities**

Mr. Harrell is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Mr. Harrell is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5. Additional Compensation**

Jeffrey A. Harrell does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Although McGill Advisors does not compensate any person for client referrals, including internal personnel, as a principal and owner of McGill Advisors, Mr. Harrell is compensated, in part, based on net profits of the firm. These profits will include revenues generated from existing and new client relationships, some of which may have been referred by the shareholder.

## **Item 6. Supervision**

Mr. Harrell is Vice President of McGill Advisors as well as a member of the firm's Investment Executive Committee and Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, CEO, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Sytz reviews Mr. Harrell's personal securities transactions and can be reached at (866) 727-6100.

**Part 2B of Form ADV: *Brochure Supplement***

Brett S. Miller  
McGill Advisors, Inc.  
8816 Red Oak Blvd., Suite 260  
Charlotte, NC 28217  
866-727-6100

01/01/2017

This brochure supplement provides information about Brett S. Miller that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Robert V. Sytz, Jr., President of McGill Advisors, if you did not receive McGill Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Brett S. Miller is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



## **Item 2. Educational, Background and Business Experience**

**Name:** Brett S. Miller      **Born:** 1985

### **Education**

- Graduated from The Citadel, the Military College of South Carolina in 2007 with a B.S. in Business Administration - Accounting Concentration.

### **Business Experience**

- Chief Compliance Officer with McGill Advisors, Inc. from 01/15 to present.
- Vice President and Director of Operations with McGill Advisors, Inc. from 01/14 to present.
- Investment Adviser Representative with McGill Advisors, Inc. from 06/07 to present.
- Principal and Shareholder of McGill Advisors, Inc. from 01/15 to present.

### **Professional Designations**

- Certified Public Accountant (CPA), 2008.
- Certified Financial Planner (CFP), 2010.

## **Item 3. Disciplinary Information**

- Brett S. Miller has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **A. Investment-Related Activities**

Mr. Miller is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Mr. Miller is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5. Additional Compensation**

Brett S. Miller does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Although McGill Advisors does not compensate any person for client referrals, including internal personnel, as a principal and owner of McGill Advisors, Mr. Miller is compensated, in part, based on net profits of the firm. These profits will include revenues generated from existing and new client relationships, some of which may have been referred by the shareholder.

## **Item 6. Supervision**

Mr. Miller is an investment adviser representative of McGill Advisors as well as a member of the firm's Investment Executive Committee and Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, and CEO, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Sytz reviews Mr. Miller's personal securities transactions and can be reached at (866) 727-6100.

**Part 2B of Form ADV: *Brochure Supplement***

Kenneth W. Poe, Jr.  
McGill Advisors, Inc.  
8816 Red Oak Blvd., Suite 260  
Charlotte, NC 28217  
866-727-6100

01/01/2017

This brochure supplement provides information about Kenneth W. Poe, Jr. that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Brett S. Miller, Chief Compliance Officer of McGill Advisors, if you did not receive McGill Advisor's brochure or if you have any questions about the contents of this supplement.

Additional information about Kenneth W. Poe, Jr. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2. Educational, Background and Business Experience**

**Name:** Kenneth W. Poe, Jr.      **Born:** 1982

### **Education**

- Graduated from Wake Forest University in 2004 with a B.A. in Communication.

### **Business Experience**

- Vice President and Director of Sales with McGill Advisors, Inc. from 01/14 to present.
- Investment Adviser Representative with McGill Advisors, Inc. from 04/10 to present.
- Principal and Shareholder of McGill Advisors, Inc. from 01/15 to present.
- Project Manager and Registered Representative with Synergy Investment Group from 05/07 to 04/10.
- Sales and Marketing Assistant and Registered Sales Assistant with Synergy Investment Group from 06/04 to 05/07.

### **Professional Designations**

- Certified Financial Planner (CFP), 2007.

## **Item 3. Disciplinary Information**

- Kenneth W. Poe, Jr. has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **A. Investment-Related Activities**

Mr. Poe is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Mr. Poe is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5. Additional Compensation**

Kenneth W. Poe, Jr. does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Although McGill Advisors does not compensate any person for client referrals, including internal personnel, as a principal and owner of McGill Advisors, Mr. Poe is compensated, in part, based on net profits of the firm. These profits will include revenues generated from

existing and new client relationships, some of which may have been referred by the shareholder.

#### **Item 6. Supervision**

Mr. Poe is an investment adviser representative of McGill Advisors as well as a member of the firm's Investment Executive Committee and Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, and CEO, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Miller reviews Mr. Poe's personal securities transactions and can be reached at (866) 727-6100.

**Part 2B of Form ADV: *Brochure Supplement***

Eric A. Harbert  
McGill Advisors, Inc.  
8816 Red Oak Blvd., Suite 260  
Charlotte, NC 28217  
866-727-6100

01/01/2017

This brochure supplement provides information about Eric A. Harbert that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Brett S. Miller, Chief Compliance Officer of McGill Advisors, if you did not receive McGill Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Eric A. Harbert is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2. Educational, Background and Business Experience**

**Name:** Eric A. Harbert

**Born:** 1982

### **Education**

- Graduated from University of North Carolina at Charlotte in 2006 with a B.S. in Accounting
- Graduated from University of North Carolina at Charlotte in 2008 with a M.A.C.

### **Business Experience**

- Investment Adviser Representative with McGill Advisors, Inc. from 06/2015 to present
- Investment Adviser Representative with Greer Walker Wealth Management, LLC from 01/2012 to 06/2015
- Senior Tax Manager with Greer Walker, LLP from 06/2006 to 06/2015

### **Professional Designations**

- Certified Public Accountant (CPA), 2009.
- Certified Financial Planner (CFP), 2011.

## **Item 3. Disciplinary Information**

- Eric Harbert has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **A. Investment-Related Activities**

Mr. Harbert is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Mr. Harbert is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5. Additional Compensation**

Mr. Harbert does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6. Supervision**

Mr. Harbert is an investment adviser representative of McGill Advisors as well as a member of the firm's Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, and CEO, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Miller reviews Mr. Harbert's personal securities transactions and can be reached at (866) 727- 6100.



**Part 2B of Form ADV: *Brochure Supplement***

Thomas W. Farmer  
McGill Advisors, Inc.  
8816 Red Oak Blvd., Suite 260  
Charlotte, NC 28217  
866-727-6100

01/01/2017

This brochure supplement provides information about Thomas W. Farmer that supplements the McGill Advisors, Inc. (McGill Advisors) brochure. You should have received a copy of that brochure. Please contact Brett S. Miller, Chief Compliance Officer of McGill Advisors, if you did not receive McGill Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas W. Farmer is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2. Educational, Background and Business Experience**

**Name:** Thomas W. Farmer      **Born:** 1983

### **Education**

- Graduated from University of The South in 2006 with a B.A. in English

### **Business Experience**

- Investment Adviser Representative with McGill Advisors, Inc. from 06/2016 to present
- Registered Representative with Wells Fargo Advisors, LLC from 05/2009 to 06/2016
- Registered Representative with Wachovia Securities from 10/2006 to 05/2009

### **Professional Designations**

- Certified Financial Planner (CFP), 2011.
- Certified 401(k) Professional (C(k)P), 2014.

## **Item 3. Disciplinary Information**

- Thomas Farmer has no reportable disciplinary history.

## **Item 4. Other Business Activities**

### **C. Investment-Related Activities**

Mr. Farmer is not engaged in any other investment-related activities and does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **D. Non Investment-Related Activities**

Mr. Farmer is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5. Additional Compensation**

Mr. Farmer does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6. Supervision**

Mr. Farmer is an investment adviser representative of McGill Advisors as well as a member of the firm's Investment Committee.

The **Investment Executive Committee** is responsible for the supervision of the firm's staff, formulation of the firm's investment philosophy and monitoring of investment advice offered to clients. Robert V. Sytz, Jr., President, Treasurer, and CEO, Brett S. Miller, CCO, Vice President and Director of Operations, Jeffrey A. Harrell, Vice President and Director of Portfolio Management, K. Warren Poe, Jr., Vice President and Director of Sales, and John K. McGill, Executive Vice President, Secretary and Director of Marketing serve on this committee.

The **Investment Committee** is responsible for the research, selection and monitoring of securities to be used in the firm's various investment strategies and asset allocation models. Mr. Sytz, Mr. Harrell, Mr. McGill, Mr. Miller, Mr. Poe, Mr. Harbert and Mr. Farmer serve on this committee.

Mr. Miller reviews Mr. Farmer's personal securities transactions and can be reached at (866) 727-6100.