



## **G2 Capital Management, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 23, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of G2 Capital Management, LLC (“G2 Capital Management” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (614) 484-1400.

G2 Capital Management is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about G2 Capital Management to assist you in determining whether to retain the Advisor.

Additional information about G2 Capital Management and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 286521.

**G2 Capital Management, LLC**  
**1600 West Lane Avenue, Suite 270, Columbus, OH 43221**  
**Phone: (614) 484-1400**

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of G2 Capital Management. For convenience, we have combined these documents into a single disclosure document.

G2 Capital Management believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. G2 Capital Management encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 286521. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (614) 484-1400.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

G2 Capital Management, LLC (“G2 Capital Management” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of the State of Ohio. G2 Capital Management became an LLC in January 2017, and is owned and operated by Greg R. Grabovac, JD (Principal) and Jeffrey R. Gomez, CPA, CFP® (Principal and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by G2 Capital Management.

### **B. Advisory Services Offered**

G2 Capital Management offers investment advisory services to individuals, high net worth individuals, trusts, estates, corporations and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

G2 Capital Management provides Clients with a choice of three tiers of services: 1) Investment Management Services; 2) Wealth Management Services; and 3) Family Office Advisory Services.

#### Investment Management Services

G2 Capital Management provides discretionary investment management services to Clients on a fee-only basis. These services are available for Clients who do not wish to engage in the more comprehensive wealth management and financial planning efforts and only desire to engage G2 Capital Management to manage their investments on a stand-alone basis.

G2 Capital Management will first seek to understand the Client’s investment objectives and risk tolerance. G2 Capital Management will work closely with the Client to create an investment policy statement (“IPS”) to formally summarize the results of these efforts. G2 Capital Management will then construct a portfolio, consisting of low-cost, diversified mutual funds, index funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds or options contracts to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

G2 Capital Management’s investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. G2 Capital Management will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

G2 Capital Management evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. G2 Capital Management may recommend, on occasion, redistributing investment allocations to diversify the portfolio. G2 Capital Management may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. G2 Capital Management may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will G2 Capital Management accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see Item 12 – Brokerage Practices.

#### Wealth Management Services

G2 Capital Management may provide Clients with wealth management services, which generally includes a broad range of comprehensive financial planning services in connection with discretionary management of investment portfolios, pursuant to a wealth management agreement. The discretionary management of investment portfolios services are described above. The financial planning services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

G2 Capital Management may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. The Advisor may provide a written summary of the Client's financial situation, observations, and recommendations as part of the wealth management services.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### Family Office Advisory Services

For family office Clients, the Advisor offers an expanded suite of services. Generally, these services are available to individuals, families, trusts, closely held corporations and other businesses. These services may include the discretionary management of investment portfolios and all financial planning services as well as advice on intergenerational wealth transfer strategies, family meeting facilitation and education, philanthropic planning, review of private investment opportunities and detailed cash flow planning and management. Additionally, G2 Capital Management offers a multi-advisor consolidated reporting service so that the Client has the ability to efficiently review investment performance by all of their advisors. All decisions to work with other advisors are made at the sole discretion of the Client. Upon request, G2 Capital Management may suggest the Client talk with other advisory firms, but the Client is under no obligation to do so, or act upon any suggestion. G2 Capital Management may use third parties and coordinate with various experts such as an accountant, attorney or other specialists to advise Clients on their wealth management and advisory services, including retirement and estate planning goals.

#### Retirement Plan Advisory Services

G2 Capital Management provides non-discretionary retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services may include:

- Vendor Analysis

- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Support
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by G2 Capital Management serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of G2 Capital Management's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

### **C. Client Account Management**

Prior to engaging G2 Capital Management to provide investment advisory services, each Client will work with the Advisor to create an IPS that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – G2 Capital Management, in connection with the Client, will develop a strategy and IPS that seeks to achieve the Client's goals and objectives.
- Asset Allocation – G2 Capital Management will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – G2 Capital Management will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – G2 Capital Management will provide investment management and ongoing oversight of the Client's investment portfolio.

### **D. Wrap Fee Programs**

G2 Capital Management does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by G2 Capital Management.

### **E. Assets Under Management**

As of December 31, 2018, G2 Capital Management has a combined total of assets under management and assets under advisement of \$358,974,705.

Of this total amount, \$178,671,013 are assets under management with \$177,724,374 managed on a discretionary basis and \$946,639 managed on a non-discretionary basis. Also included in the total amount, the Advisor has \$180,303,692 in assets under advisement. Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### A. Fees for Advisory Services

#### Investment Management Services/Wealth Management Services/Family Office Advisory Services

For Clients engaged for Investment Management, Wealth Management or Family Office Advisory Services, the Client's fees are due quarterly, in advance of each calendar quarter, pursuant to the terms of the applicable advisory agreement. Investment Management, Wealth Management or Family Office Advisory fees (the "investment advisory fee") are based on the market value of assets under management at the end of the prior quarter at annual rate based off the following fee schedules for each service:

##### *Investment Management Services*

<b>Market Value of Investment Assets</b>	<b>Quarterly Fee %</b>	<b>Annual Fee %</b>
First \$2 Million	.1750%	.70%
In excess of \$2 Million and up to \$4 million	.1250%	.50%
In excess of \$4 Million	.0750%	.30%

\*Investment Management Clients are subject to a minimum quarterly fee of \$1,250.

##### *Wealth Management Services*

<b>Market Value of Investment Assets</b>	<b>Quarterly Fee %</b>	<b>Annual Fee %</b>
First \$2 Million	.2500%	1.00%
In excess of \$2 Million and up to \$4 million	.1875%	.75%
In excess of \$4 Million	.1250%	.50%

\*Wealth Management Clients are subject to a minimum quarterly fee of \$3,750.

##### *Family Office Advisory Services –*

The Advisor may charge an annual fee of up to 1.00% of assets under management for Family Office Advisory Services. The fees for Family Office Advisory Services may vary depending upon the complexity of the engagement and anticipated time to be incurred by the Advisor.

Wealth Management and Family Office Advisory Services may also include an annual flat fee in addition to the asset management fee. This fee will be dependent upon the complexity of the engagement and anticipated time to be incurred by the Advisor.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by G2 Capital Management will be independently valued by the Custodian. G2 Capital Management will not have the authority or responsibility to value portfolio securities.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.00%, billed quarterly in advance. Fees may be negotiable depending on the size and complexity of the Plan.

## **B. Fee Billing**

### Investment Management Services/Wealth Management Services/Family Office Advisory Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with G2 Capital Management at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

Clients provide written authorization permitting advisory fees to be deducted by G2 Capital Management directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. In certain circumstances at the Client's direction, the Advisor may invoice the Client directly for the services rendered.

### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than G2 Capital Management, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by G2 Capital Management are separate and distinct from these custody and execution fees.

In addition, all fees paid to G2 Capital Management for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of G2 Capital Management, but would not receive the services provided by G2 Capital Management which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by G2 Capital Management to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

## **D. Advance Payment of Fees and Termination**

### Investment Management Services/Wealth Management Services/Family Office Advisory Services

G2 Capital Management is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

G2 Capital Management is compensated for its services in advance of the quarter in which retirement plan advisory services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan advisory



agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be responsible for retirement plan advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid retirement plan advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

G2 Capital Management does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

James H. Graver is a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 35747), member FINRA and SIPC. Mr. Graver currently does not recommend new commissionable transactions to Clients. Certain Clients may have legacy commissionable positions implemented through Mr. Graver for which ongoing commissions are received by Mr. Graver. Compensation earned by the Mr. Graver in his capacity as a registered representative of PKS is separate and in addition to the Advisor's fees. Neither the Advisor nor Mr. Graver will earn ongoing investment advisory fees in connection with any products or services implemented in his separate capacity as a registered representative. Please see Item 10 below.

James H. Graver is also licensed as an independent insurance professional. He does not sell insurance products to Clients. As an independent insurance professional, Mr. Graver may receive previous commission-based compensation for previously sold insurance products. Insurance commissions received by Mr. Graver are distinct and separate from G2 Capital Management. Please see Item 10 below.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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G2 Capital Management does not charge performance-based fees for its investment advisory services. The fees charged by G2 Capital Management are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

G2 Capital Management does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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G2 Capital Management offers investment advisory services to individuals, high net worth individuals, trusts, estates, corporations and retirement plans. The amount of each type of Client is available on G2 Capital Management's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. G2 Capital Management generally does not impose a minimum relationship size.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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##### **A. Methods of Analysis**

G2 Capital Management is primarily focused on managing risk and generating returns through highly disciplined and proprietary rules-based investment ("RBI") processes. The RBI approach acknowledges efficient markets and identifies factors that represent a greater determinant of alpha than conventional fundamental analysis. A core tenet of the RBI philosophy is the removal of human bias from the decision-making process.

G2 Capital Management may also employ fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from G2 Capital Management are derived from numerous

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G2 Capital Management, LLC  
1600 West Lane Avenue, Suite 270, Columbus, OH 43221  
Phone: [\(614\) 484-1400](tel:6144841400)

sources, including financial media companies, third-party research materials, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to Clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that G2 will be able to accurately predict such a reoccurrence.

As noted above, G2 Capital Management generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. G2 Capital Management will typically hold all or a portion of a security or fund for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, G2 Capital Management may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. G2 Capital Management will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategies:

#### Market Risks

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

#### ETF Risks

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

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving G2 Capital Management or any of its Supervised Persons.** G2 Capital Management values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 286521.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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#### Broker- Dealer Affiliation

As noted in Item 5.E., Mr. Graver also serves as a registered representative of PKS. In his separate capacity as a registered representative of PKS, Mr. Graves receives commissions for the prior implementation of commissionable transactions. Mr. Graver currently does not recommend new commissionable transactions to Clients. Neither the Advisor nor Mr. Graves will earn ongoing investment advisory fees in connection with any services implemented in Mr. Graver's separate capacity as a registered representative.

#### Insurance Licensing

As noted in Item 5.E., Mr. Graver is also licensed as an independent insurance professional. He does not sell insurance products to Clients. As an independent insurance professional, Mr. Graver may receive previous commission-based compensation for previously sold insurance products. Insurance commissions received by Mr. Graver are distinct and separate from G2 Capital Management.

#### Licensed Attorney

Mr. Grabovac is a licensed attorney with the State of Ohio. Mr. Grabovac maintains this licensing but does not provide legal services to Clients or non-clients.

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### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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#### **A. Code of Ethics**

G2 Capital Management has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with G2 Capital Management (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. G2 Capital Management and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of G2 Capital Management’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (614) 484-1400.

#### **B. Personal Trading with Material Interest**

G2 Capital Management allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. G2 Capital Management does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. G2 Capital Management does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

G2 Capital Management allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by G2 Capital Management requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While G2 Capital Management allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will G2 Capital Management, or any Supervised Person of G2 Capital Management transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

G2 Capital Management does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize G2 Capital Management to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, G2 Capital Management does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where G2 Capital Management does not exercise discretion over the selection of the Custodian, the Advisor may recommend the Custodian to Clients. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by the Advisor. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. G2 Capital Management may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices.

G2 Capital Management will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". G2 Capital Management maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below. Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **G2 Capital Management does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain indirect benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - G2 Capital Management does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where G2 Capital Management will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). G2 Capital Management will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. G2 Capital Management will execute its transactions through account[s] established by the Client at the Custodian. G2 Capital Management may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by the Principal Officers of G2 Capital Management. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify G2 Capital Management if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by G2 Capital Management**

#### Participation in Institutional Advisor Platform

G2 Capital Management has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like G2 Capital Management. As a registered investment advisor participating on the Schwab Advisor Services platform, G2 Capital Management receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and support to G2 Capital Management that may not benefit the Client, including: educational conferences and events, consulting services

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and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. G2 Capital Management believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B. Client Referrals from Solicitors**

G2 Capital Management does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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All Clients must maintain their accounts with a “qualified custodian” as described in item 12. G2 Capital Management accepts custody of a Client's funds or securities, through the deduction of management fees from the Client's account[s] at the Custodian, and in certain situations where a Supervised Person of G2 Capital Management may have access to a Client's held-away account login credentials.

Additionally, if the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Clients will receive account statements at least quarterly and generally monthly from the Custodian. Clients are urged to compare the Custodian account statements against statements prepared by G2 Capital Management for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custody statement is the official record of your account for tax purposes. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

#### Surprise Independent Examination

As G2 Capital Management is deemed to have custody over certain Client accounts and/or securities as part of their access to Client login credentials, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which G2 Capital Management maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

### **Item 16 – Investment Discretion**

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G2 Capital Management generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by G2 Capital Management. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by G2 Capital Management will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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G2 Capital Management does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither G2 Capital Management, nor its management have any adverse financial situations that would reasonably impair the ability of G2 Capital Management to meet all obligations to its Clients. Neither G2 Capital Management, nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. G2 Capital Management is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.





## **Form ADV Part 2B – Brochure Supplement**

**for**

**Greg R. Grabovac, JD  
Principal**

**Effective: April 23, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Greg R. Grabovac, JD (CRD# 6301286) in addition to the information contained in the G2 Capital Management, LLC (“G2 Capital Management” or the “Advisor”, CRD# 286521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the G2 Capital Management Disclosure Brochure or this Brochure Supplement, please contact us at (614) 484-1400.

Additional information about Mr. Grabovac is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6301286.

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**Item 2 – Educational Background and Business Experience**

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Greg R. Grabovac, JD, born in 1967, is dedicated to advising Clients of G2 Capital Management as a Principal. Mr. Grabovac earned a Juris Doctor, with honors from Ohio State University in 1994. Mr. Grabovac also earned a Bachelor of Science in Business Administration, Summa Cum Laude from Ohio State University in 1989. Information regarding Mr. Grabovac's employment history is included below.

**Employment History:**

Principal, G2 Capital Management, LLC	01/2017 to Present
Registered Representative, Wealthstone Equities, Inc.	02/2014 to 11/2016
Partner, Wealthstone, Inc. (01/2014 to 01/2017) Wealth Advisor, Wealthstone, Inc. (10/2012 to 12/2013)	10/2012 to 01/2017
Vice President and General Counsel, The Fishel Company	01/2001 to 09/2012

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**Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Grabovac.*** Mr. Grabovac has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Grabovac.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Grabovac.***

However, we do encourage you to independently view the background of Mr. Grabovac on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6301286.

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**Item 4 – Other Business Activities**

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Mr. Grabovac is a board member for a non-profit organization. Mr. Grabovac is not compensated for his role as a board member.

Mr. Grabovac is also a licensed attorney with the State of Ohio. Mr. Grabovac maintains this licensing but does not provide legal services to Clients or non-clients at this time.

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**Item 5 – Additional Compensation**

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Mr. Grabovac is dedicated to the investment advisory activities of G2 Capital Management's Clients. Mr. Grabovac does not receive any additional forms of compensation.

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**Item 6 – Supervision**

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Mr. Grabovac serves as a Principal of G2 Capital Management and is supervised by Jeffrey Gomez, the Chief Compliance Officer. Mr. Gomez can be reached at (614) 484-1400 or [jgomez@g2capital.net](mailto:jgomez@g2capital.net).

G2 Capital Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of G2 Capital Management. Further, G2 Capital Management is subject to regulatory oversight by various agencies. These agencies require registration by G2 Capital Management and its Supervised Persons. As a registered entity, G2 Capital Management is

subject to examinations by regulators, which may be announced or unannounced. G2 Capital Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jeffrey R. Gomez, CPA, CFP®**  
**Principal and Chief Compliance Officer**

**Effective: April 23, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey R. Gomez, CPA, CFP® (CRD# 5299393) in addition to the information contained in the G2 Capital Management, LLC (“G2 Capital Management” or the “Advisor”, CRD# 286521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the G2 Capital Management Disclosure Brochure or this Brochure Supplement, please contact us at (614) 484-1400.

Additional information about Mr. Gomez is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5299393.

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## **Item 2 – Educational Background and Business Experience**

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Jeffrey R. Gomez, CFP®, born in 1968, is dedicated to advising Clients of G2 Capital Management as a Principal and Chief Compliance Officer. Mr. Gomez also earned a Bachelor of Arts in Accounting & Finance from Ohio State University in 1992 and is an active CPA in Ohio. Additional information regarding Mr. Gomez's employment history is included below.

### **Employment History:**

Principal, G2 Capital Management, LLC	01/2017 to Present
Partner, Wealthstone, Inc. (01/2007 to 01/2017) Senior Manager, Wealthstone, Inc. (10/2005 to 01/2017)	10/2005 to 01/2017
Registered Representative, Wealthstone Equities, Inc	04/2010 to 11/2016
Senior Manager, Ernst and Young	10/1996 to 07/2005

### **Certified Public Accountant ("CPA")**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain Client consent if a conflict exists), maintain Client confidentiality, disclose to the Client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

### **About the CFP® Designation**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### **Item 3 – Disciplinary Information**

***There are no legal, civil or disciplinary events to disclose regarding Mr. Gomez.*** Mr. Gomez has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Gomez.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Gomez.***

However, we do encourage you to independently view the background of Mr. Gomez on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5299393.

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### **Item 4 – Other Business Activities**

Mr. Gomez is a partial owner in three investment holding companies and one operating company. There is no relationship between these entities and G2 Capital Management.

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### **Item 5 – Additional Compensation**

Mr. Gomez is dedicated to the investment advisory activities of G2 Capital Management's Clients. Mr. Gomez does not receive any additional forms of compensation.

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### **Item 6 – Supervision**

Mr. Gomez serves as a Principal and Chief Compliance Officer of G2 Capital Management. Mr. Gomez can be reached at (614) 484-1400 or [jgomez@g2capital.net](mailto:jgomez@g2capital.net).

G2 Capital Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of G2 Capital Management. Further, G2

Capital Management is subject to regulatory oversight by various agencies. These agencies require registration by G2 Capital Management and its Supervised Persons. As a registered entity, G2 Capital Management is subject to examinations by regulators, which may be announced or unannounced. G2 Capital Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**James H. Graver  
Principal**

**Effective: April 23, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James H. Graver (CRD# 2835090) in addition to the information contained in the G2 Capital Management, LLC (“G2 Capital Management” or the “Advisor”, CRD# 286521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the G2 Capital Management Disclosure Brochure or this Brochure Supplement, please contact us at (614) 484-1400.

Additional information about Mr. Graver is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2835090.

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## Item 2 – Educational Background and Business Experience

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James H. Graver, born in 1967, is dedicated to advising Clients of G2 Capital Management as a Principal. Mr. Graver earned a Bachelor of Science in Finance, and an Associate's in Real Estate from Franklin University in 1990. Additional information regarding Mr. Graver's employment history is included below.

### Employment History:

Principal, G2 Capital Management, LLC	06/2017 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	06/2017 to Present
Registered Representative, Wells Fargo	02/2009 to 06/2017
Financial Advisor, Sagepoint Financial	05/2006 to 02/2009
Financial Advisor, Preferred Capital Management	10/2001 to 08/2006
Registered Representative, Raymond James	06/2001 to 05/2006

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## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Graver.*** Mr. Graver has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Graver.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Graver.***

However, we do encourage you to independently view the background of Mr. Graver on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2835090.

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## Item 4 – Other Business Activities

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### Broker- Dealer Affiliation

James H. Graver is a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In his separate capacity as a registered representative of PKS, Mr. Graves receives commissions for the prior implementation of commissionable transactions. Mr. Graver currently does not recommend new commissionable transactions to Clients. Neither the Advisor nor Mr. Graves will earn ongoing investment advisory fees in connection with any services implemented in Mr. Graver's separate capacity as a registered representative.

### Insurance Licensing

Mr. Graver is also licensed as an independent insurance professional. He does not sell insurance products to Clients. As an independent insurance professional, Mr. Graver may receive previous commission-based compensation for previously sold insurance products. Insurance commissions received by Mr. Graver are distinct and separate from G2 Capital Management. Please see Item 5 – Fees and Compensation and Item 10 – Other Financial Industry Activities and Affiliations above.

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## Item 5 – Additional Compensation

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Mr. Graver has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Graver serves as a Principal of G2 Capital Management and is supervised by Jeffrey Gomez, the Chief Compliance Officer. Mr. Gomez can be reached at (614) 484-1400 or [jgomez@g2capital.net](mailto:jgomez@g2capital.net).

G2 Capital Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of G2 Capital Management. Further, G2 Capital Management is subject to regulatory oversight by various agencies. These agencies require registration by G2 Capital Management and its Supervised Persons. As a registered entity, G2 Capital Management is subject to examinations by regulators, which may be announced or unannounced. G2 Capital Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Nicholas K. Rinker, CFA®  
Investment Analyst / Wealth Manager**

**Effective: April 23, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Nicholas K. Rinker (CRD# 6717080) in addition to the information contained in the G2 Capital Management, LLC (“G2 Capital Management” or the “Advisor”, CRD# 286521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the G2 Capital Management Disclosure Brochure or this Brochure Supplement, please contact us at (614) 484-1400.

Additional information about Mr. Rinker is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6717080.

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**Item 2 – Educational Background and Business Experience**

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Nicholas K. Rinker, CFA® born in 1983, is dedicated to advising Clients of G2 Capital Management as a Wealth Manager. Mr. Rinker also earned a Bachelor of Science in Business Administration from the University of Richmond in 2006. Additional information regarding Mr. Rinker's employment history is included below.

**Employment History:**

Wealth Manager, G2 Capital Management, LLC	05/2017 to Present
Financial Advisor, Raymond James & Associates, Inc.	10/2016 to 05/2017
Vice President, Stadion Capital Partners	12/2014 to 04/2016
Vice President, Red Capital Partners	07/2011 to 12/2014
Senior Analyst, American Capital	08/2008 to 07/2011
Audit Senior Assistant, Deloitte & Touche	10/2006 to 08/2008

**Chartered Financial Analyst® (“CFA®”)**

The Chartered Financial Analyst (“CFA®”) charter is a professional designation established in 1962 and awarded by CFA® Institute. To earn the CFA® charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA® Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA® charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA® Institute Code of Ethics and Standards of Professional Conduct. Chartered Financial Analyst and CFA® are trademarks owned by CFA® Institute.

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**Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Rinker.*** Mr. Rinker has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rinker.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Rinker.***

However, we do encourage you to independently view the background of Mr. Rinker on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6717080.

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**Item 4 – Other Business Activities**

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Mr. Rinker is dedicated to the investment advisory activities of G2 Capital Management's Clients. Mr. Rinker does not have any other business activities.

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**Item 5 – Additional Compensation**

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Mr. Rinker is dedicated to the investment advisory activities of G2 Capital Management's Clients. Mr. Rinker does not receive any additional forms of compensation.

## **Item 6 – Supervision**

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Mr. Rinker serves as a Wealth Manager of G2 Capital Management and is supervised by Jeffrey Gomez, the Chief Compliance Officer. Mr. Gomez, CPA, CFP® can be reached at (614) 484-1400 or [jgomez@g2capital.net](mailto:jgomez@g2capital.net).

G2 Capital Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of G2 Capital Management. Further, G2 Capital Management is subject to regulatory oversight by various agencies. These agencies require registration by G2 Capital Management and its Supervised Persons. As a registered entity, G2 Capital Management is subject to examinations by regulators, which may be announced or unannounced. G2 Capital Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: April 23, 2019

### Our Commitment to You

G2 Capital Management, LLC ("G2 Capital Management" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. G2 Capital Management (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

G2 Capital Management does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> G2 Capital Management does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where G2 Capital Management or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> G2 Capital Management does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (614) 484-1400.