

# GreenCourse Financial Advisors, LLC

## Wrap Fee Program Brochure

*This wrap fee program brochure provides information about the qualifications and business practices of GreenCourse Financial Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (636) 730-1220 or by email at: [Janet@greencoursefinadv.com](mailto:Janet@greencoursefinadv.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about GreenCourse Financial Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). GreenCourse Financial Advisors, LLC's CRD number is: 290646.*

390 South Woods Mill Suite 250  
Chesterfield, MO 63017  
(636) 730-1220  
[Janet@greencoursefinadv.com](mailto:Janet@greencoursefinadv.com)  
<https://www.Greencoursefinadv.com>

*Registration does not imply a certain level of skill or training.*

Version Date: 05/30/2019

## **Item 2: Material Changes**

material changes in this brochure from the last annual updating amendment of GreenCourse Financial Advisors, LLC on 03/05/2019 are described below. Material changes relate to GreenCourse Financial Advisors, LLC's policies, practices or conflicts of interests.

## Item 3: Table of Contents

Item 1: Cover Page

### Table of Contents

Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Services Fees and Compensation .....	5
A. Description of Services .....	5
B. Contribution Cost Factors .....	6
C. Additional Fees .....	6
D. Compensation of Client Participation .....	6
Item 5: Account Requirements and Types of Clients .....	6
Item 6: Portfolio Manager Selection and Evaluation.....	7
A. Selecting/Reviewing Portfolio Managers .....	7
Standards Used to Calculate Portfolio Manager Performance .....	7
Review of Performance Information.....	7
B. Related Persons .....	7
C. Advisory Business .....	7
Wrap Fee Portfolio Management .....	7
Performance-Based Fees and Side-By-Side Management.....	8
Services Limited to Specific Types of Investments .....	8
Client Tailored Services and Client Imposed Restrictions.....	8
Wrap Fee Programs.....	9
Amounts Under Management.....	9
Methods of Analysis and Investment Strategies.....	9
Material Risks Involved.....	9
Risks of Specific Securities Utilized .....	10
Voting Client Proxies .....	12
Item 7: Client Information Provided to Portfolio Managers .....	12
Item 8: Client Contact with Portfolio Managers.....	12

Item 9: Additional Information .....	12
A.    Disciplinary Action and Other Financial Industry Activities .....	12
Criminal or Civil Actions .....	12
Administrative Proceedings.....	12
Self-regulatory Organization Proceedings.....	12
Registration as a Broker/Dealer or Broker/Dealer Representative .....	13
Registration as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor .....	13
Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests..	13
Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections.....	13
B.    Code of Ethics, Client Referrals, and Financial Information .....	13
Code of Ethics .....	13
Recommendations Involving Material Financial Interests .....	14
Investing Personal Money in the Same Securities as Clients .....	14
Trading Securities At/ Around the Same Time as Clients' Securities .....	14
Frequency and Nature of Periodic Reviews and Who Makes Those Reviews .....	14
Factors That Will Trigger a Non-Periodic Review of Client Accounts .....	14
Content and Frequency of Regular Reports Provided to Clients .....	15
Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	15
Compensation to Non – Advisory Personnel for Client Referrals .....	16
Balance Sheet.....	16
Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	16
Bankruptcy Petitions in Previous Ten Years .....	16

## Item 4: Services Fees and Compensation

GreenCourse Financial Advisors, LLC (hereinafter “GreenCourse”) offers the following services to advisory clients:

### A. Description of Services

GreenCourse participates in and sponsors wrap fee programs, which means GreenCourse will wrap third party fees (i.e., custodian fees, brokerage fees, transaction fees, etc.) for wrap fee portfolio management accounts. GreenCourse will charge clients one fee and pay all transaction fees using the fee collected from the client. Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that GreenCourse has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs.

Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

The fee schedule is set forth below:

Total Assets Under Management	Annual Fees
\$0 - \$500,000	1.25%
\$500,001 - \$1,000,000	0.90%
\$1,000,001 - \$3,000,000	0.65%
\$3,000,001 - \$5,000,000	0.50%
\$5,000,001 - \$7,500,000	0.40%
\$7,500,001 – And Up	0.35%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the client contract. GreenCourse uses the last day of previous quarter for purposes of determining the market value of the assets upon which the advisory fee is based.

Advisory fees are withdrawn directly from the client’s accounts with client written authorization. Fees are paid quarterly in advance. Refunds are given on a prorated basis, based on the number of days remaining in the billing period on the effective date of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the billing period up to and including the

effective date of termination. (\*The daily rate is calculated by dividing the annual fee by 365).

Clients may terminate the contract without penalty, for full refund, within five business days of signing the contract. Thereafter, clients may terminate the contract with thirty days' written notice.

## **B. Contribution Cost Factors**

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

## **C. Additional Fees**

Clients who participate in the wrap fee program will not have to pay for transaction or trading fees. However, clients are still responsible for all other account fees, such as annual IRA fees to the custodian, fees for trades executed away from the custodian, transition fees if the account is moved to another broker, or mutual fund fees.

## **D. Compensation of Client Participation**

Neither GreenCourse, nor any representatives of GreenCourse receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, GreenCourse may have a financial incentive to recommend the wrap fee program to clients.

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

GreenCourse generally provides its wrap fee program services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

GreenCourse has varying minimum account requirements for different types of accounts and strategies, but the firm reserves the right to waive requirements or not accept certain accounts based on the size of the account and the nature of the services being provided. All Clients with over \$5M in investable assets will be offered the opportunity to participate within one quarter of reaching the required AUM. Legacy clients (below the \$5M minimum) may be continued at GFA's discretion.

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

### **A. Selecting/Reviewing Portfolio Managers**

GreenCourse will not select any outside portfolio managers for management of this wrap fee program. GreenCourse will be the sole portfolio manager for this wrap fee program.

#### ***Standards Used to Calculate Portfolio Manager Performance***

GreenCourse will use industry standards to calculate portfolio manager performance.

#### ***Review of Performance Information***

GreenCourse reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed quarterly and is reviewed by GreenCourse.

### **B. Related Persons**

GreenCourse and its personnel serve as the portfolio managers for all wrap fee program accounts. This is a conflict of interest in that no outside adviser assesses GreenCourse's management of the wrap fee program. However, GreenCourse addresses this conflict by acting in its clients' best interest consistent with its fiduciary duty as sponsor and portfolio manager of the wrap fee program.

### **C. Advisory Business**

GreenCourse offers portfolio management services to its wrap fee program participants as discussed in Section 4 above.

#### ***Wrap Fee Portfolio Management***

GreenCourse offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. GreenCourse creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management includes, but is not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

GreenCourse evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Portfolio management accounts participating in the wrap fee program will not have to pay for transaction or trading fees. GreenCourse will charge clients one fee, and pay transaction fees using the advisory fee collected from the client. Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that GreenCourse has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, GreenCourse will always act in the best interest of its clients consistent with its fiduciary duty as an investment adviser.

### ***Performance-Based Fees and Side-By-Side Management***

GreenCourse does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### ***Services Limited to Specific Types of Investments***

GreenCourse generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and non-U.S. securities. GreenCourse may use other securities as well to help diversify a portfolio when applicable.

### ***Client Tailored Services and Client Imposed Restrictions***

GreenCourse will tailor a program for each individual client. This will normally include an interview session to get to know the client's specific needs and requirements as well as a plan to be executed by GreenCourse on behalf of the client. GreenCourse will not use "model portfolios" but rather a specific set of recommendations for each client based on their personal restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent GreenCourse from properly servicing the client account, or if the restrictions would require GreenCourse to deviate from its standard suite of services, GreenCourse reserves the right to end the relationship.



### ***Wrap Fee Programs***

GreenCourse sponsors and acts as portfolio manager for this wrap fee program. GreenCourse manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than non-wrap fee accounts. The fees paid to the wrap account program will be given to GreenCourse as a management fee.

### ***Amounts Under Management***

GreenCourse has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$158,874,904.00	\$6,210,735.00	December 2018

### ***Methods of Analysis and Investment Strategies***

GreenCourse's methods of analysis include Modern Portfolio Theory.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

GreenCourse uses long term trading, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### ***Material Risks Involved***

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

GreenCourse's use of margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that

will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### ***Risks of Specific Securities Utilized***

GreenCourse's use of margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit

rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real estate funds** (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, which the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss you, as a client, should be prepared to bear.**

### ***Voting Client Proxies***

GreenCourse will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

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

All client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is provided to the portfolio manager. The portfolio manager will also have access to that information as it changes and is updated.

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

GreenCourse places no restrictions on client ability to contact its portfolio managers. GreenCourse's representative, Maryann I Vognild can be contacted during regular business hours and contact information is on the cover page of Maryann I Vognild's Form ADV Part 2B brochure supplement.

## **Item 9: Additional Information**

### **A. Disciplinary Action and Other Financial Industry Activities**

#### ***Criminal or Civil Actions***

There are no criminal or civil actions to report.

#### ***Administrative Proceedings***

There are no administrative proceedings to report.

#### ***Self-regulatory Organization Proceedings***

There are no self-regulatory organization proceedings to report.

### ***Registration as a Broker/Dealer or Broker/Dealer Representative***

Neither GreenCourse nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

### ***Registration as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor***

Neither GreenCourse nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor.

### ***Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests***

Maryann Irene Vognild and Dale Allen Lindhorst are independent licensed insurance agents, and from time to time, will offer clients advice or products from those activities. Clients should be aware these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. GreenCourse always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of GreenCourse in connection with such individual's activities outside of GreenCourse.

Dale Allen Lindhorst is an accountant and from time to time, may offer clients advice or products from those activities and clients should be aware these services may involve a conflict of interest. GreenCourse always acts in the best interest of the client and clients are in no way required to utilize the services of any representative of GreenCourse in connection with such individual's activities outside of GreenCourse.

Eric Ellison Schaefer teach live online webinar courses covering the different domains of financial planning to prepare individuals for the CFP® examination.

### ***Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections***

GreenCourse does not utilize nor select other advisors or third party managers. All assets are managed by GreenCourse management.

## **B. Code of Ethics, Client Referrals, and Financial Information**

### ***Code of Ethics***

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions,

Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

### ***Recommendations Involving Material Financial Interests***

GreenCourse does not recommend that clients buy or sell any security in which a related person to GreenCourse or GreenCourse has a material financial interest.

### ***Investing Personal Money in the Same Securities as Clients***

From time to time, representatives of GreenCourse may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GreenCourse to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. GreenCourse will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### ***Trading Securities At/Around the Same Time as Clients' Securities***

From time to time, representatives of GreenCourse may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of GreenCourse to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, GreenCourse will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### ***Frequency and Nature of Periodic Reviews and Who Makes Those Reviews***

All client accounts for GreenCourse's advisory services provided on an ongoing basis are reviewed at least Quarterly by the client's primary advisor, with regard to clients' respective investment policies and risk tolerance levels.

### ***Factors That Will Trigger a Non-Periodic Review of Client Accounts***

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### ***Content and Frequency of Regular Reports Provided to Clients***

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

### ***Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)***

GreenCourse does not receive any economic benefit, directly or indirectly from any third party for advice rendered to GreenCourse clients.

Charles Schwab & Co., Inc. Advisor Services provides GreenCourse with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For GreenCourse client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to GreenCourse other products and services that benefit GreenCourse but may not benefit its clients' accounts. These benefits may include national, regional or GreenCourse specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of GreenCourse by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist GreenCourse in managing and administering clients' accounts. These include software and other technology (and related technological training) 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, if applicable), provide research, pricing information and other market data, facilitate payment of GreenCourse's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some

substantial number of GreenCourse's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to GreenCourse other services intended to help GreenCourse manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to GreenCourse by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to GreenCourse. GreenCourse is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

### ***Compensation to Non – Advisory Personnel for Client Referrals***

GreenCourse may directly or indirectly compensate clerical employees for client referrals.

### ***Balance Sheet***

GreenCourse does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### ***Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients***

Neither GreenCourse nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### ***Bankruptcy Petitions in Previous Ten Years***

GreenCourse has not been the subject of a bankruptcy petition in the last ten years.