

**Game Plan Advisors, Inc.**  
**d.b.a. Wootton Financial Group Inc.**  
**Client Brochure**

*This Brochure provides information about the qualifications and business practices of Game Plan Advisors, Inc. If you have any questions about the contents of this Brochure, please contact us at (936)449-5952, (866) 416-1703 or via email at [chris@woottonfinancial.com](mailto:chris@woottonfinancial.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.*

*Game Plan Advisors, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.*

*Additional information about Game Plan Advisors, Inc. is also available on the SEC's Web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

*Game Plan Advisors, Inc. SEC number is: 801-72512*

*The firm's CRD number is: 114641*

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**February 2024**

## ITEM 2: MATERIAL CHANGES

On an ongoing basis, this item will discuss only specific material changes that are made to the Brochure and provide Clients with a summary of such changes. Game Plan Advisors, Inc. (“Game Plan” or “Firm”) will also reference the date of its last annual update of the Brochure. Since our last annual amendment filing in March 2023, we have disclosed that clients using our TAMP have a minimum account size of \$25,000. Game Plan will provide clients with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, Game Plan’s Brochure may be requested by contacting Alicia Earnest by phone at (936) 449-5952 or via email at [alicia@woottonfinancial.com](mailto:alicia@woottonfinancial.com).

Additional information about Game Plan is also available via the SEC’s Web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s Web site also provides information about any persons affiliated with Game Plan who are registered, or are required to be registered, as investment adviser representatives of Game Plan.

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\* The SEC requires all investment advisers to organize their disclosure documents according to specific categories listed above, some of which may not pertain to Game Plan’s business. When a required category is not relevant to our business, we will state that it does not apply.

## **ITEM 4: ADVISORY BUSINESS**

### **A. Firm Description**

Game Plan was formed December 12, 1995 as a corporation organized pursuant to the laws of the State of Texas. Game Plan is 100% owned by Chris Wootton, who serves as President.

### **B. Types of Advisory Services**

The Firm provides fee-based Financial Planning, Investment Management and Investment Consultation Services. The Firm also provides 401(k) Advisory Services.

#### **Investment Management**

Game Plan will first review each client's present financial situation in an effort to assess the client's investment needs. Various data gathering methods and tools are utilized to fully understand the client's situation and particular needs. Investment Management provides for regular portfolio reviews as often as the client may prefer.

Portfolio Management Services provided by Game Plan include asset management of client funds. Game Plan designs, revises, reallocates and manages flexible portfolios and is authorized to use a wide variety of investments and asset classes in an attempt to seek profits and to protect capital under a wide range of changing environments. Portfolios shall attempt to achieve returns when they can reasonably be expected under prevailing market condition and account objectives. Game Plan does not promise or guarantee profits. Flexible portfolio objectives include Preservation of Capital, Income, Conservative Growth, Moderate Growth, and Aggressive Growth. Alternate names for the portfolios may be used for marketing purposes. Equities and alternative investments may be used in the Preservation and Income portfolios to preserve and increase portfolio value. Specific investments, timing and proportions are determined by Game Plan and vary over time. Flexible portfolios may include all types of mutual funds, securities or asset classes such as domestic, international, and emerging market stocks, bonds and certificates of deposit, American depository receipts, sector funds, focus funds, leveraged funds and ETFs, precious metals stock funds, bullion funds, bear market funds, short funds and individual stocks, bonds, convertibles, preferred stocks, master limited partnerships, royalty trusts, real estate investment trusts, exchange traded funds, and closed end funds. Other investments may also be used when in the client's best interest.

Clients are requested to contact Game Plan promptly if there has been any change in their current financial status to determine if there needs to be a change in investment objectives and strategies.

Clients will receive transaction statements as they may occur and a monthly or quarterly statement of account from the custodian or brokerage firm where the assets are held. Clients may also be given access to internet sites that also report transaction and balance information.

Game Plan generally maintains discretionary authority over our clients' accounts. Adviser does not have custody of any clients' funds or securities. Additionally, clients have a direct and beneficial interest in their securities, rather than an undivided interest in a pool of securities.

#### **401(k) Advisory Services**

401(k) Advisory Service is most appropriate for clients who are active participants in a company sponsored 401(k) account. We will assist clients who desire initial and ongoing assistance, recommendations and alerts in designing and managing a diversified portfolio and making adjustments for changing conditions. Game Plan's 401(k) Advisory Service includes investment monitoring, adviser alerts, dynamic asset allocation and other signals from computer-based models for active qualified plan participants that wish to manage their own accounts but want assistance with ongoing allocation decisions. This service may be useful to clients who are plan participants in an employer sponsored retirement plan such as a 401(k), 403(b), 457, Keogh, Profit Sharing, or other retirement plans. Clients receive verbal, electronic, or written recommendations regarding investment allocations and clients decide whether to follow recommendations. All advice is given on a non-discretionary basis and Game Plan does not have the authority to initiate transactions on the client's behalf.

#### **Financial Planning**

Financial Planning Services provided by Game Plan include advice on issues relating to income, estate planning, college planning, retirement planning, income tax planning (but not income tax advice or preparation), and insurance planning. After an assessment of the client's overall financial situation, a determination is made as to the fee that will be assessed to the client for the Financial Planning services that are needed. The amount of the fee will range from \$0 to \$10,000 and is based on the level of complexity of the client's financial situation as well as the scope of the overall planning services to be performed.

#### **Investment Consultation**

In addition to fee-based Investment Management, Game Plan provides investment and financial advice through individual general consultations for those clients who do not desire intensive Financial Planning or Investment Management services. These consultations can be general in nature or focused on particular areas of interest and may be uniquely personalized, depending upon the client's needs. The nature of these services will be determined at the time of engagement.

#### **Publications and Education**

Game Plan may provide a newsletter to advisory clients free of cost or obligation. The Advisory Representatives of Game Plan may conduct seminars or educational classes that may include

presentations on financial planning, investment management, various investment and insurance strategies, and college funding, estate and retirement planning. Attendees are under no obligation to do so but are welcome to engage individualized services with Game Plan.

### **Turnkey Asset Management Program Services**

We have entered into a Turnkey Asset Management Program (“TAMP”) relationship with Sherman Portfolios, LLC (“Sherman”). As a part of this TAMP relationship, Sherman shall act as a sub-advisor to manage client assets in a sleeve of models in accordance with a client’s investment objectives. These arrangements allow us to access model portfolios and strategists. The strategies are primarily comprised of individual equity securities, various mutual funds, or exchange traded funds. Each model portfolio will need to maintain a drift parameter of 1% custodial cash, with the default target allocation set at 2% of the model portfolio. As part of the program, you will give us and Sherman discretion to select, design and manage model portfolios for your assets.

The client provides us with the information set forth on the client profile and represents that such information is a complete and accurate representation of the client’s financial position and investment needs, goals, and objectives, as well as any reasonable restrictions placed on investments made in the account at the time the client enters the advisory program offered through the TAMP. The client must promptly inform us in writing if any financial information becomes incomplete or inaccurate during the term of the relationship.

Clients are advised that there are other management programs not recommended by our firm that are suitable for the client and that can be more or less costly than arrangements recommended by our firm. You are under no obligation to select this program, and are not required to select our TAMP services. Further, no guarantees of performance can ever be offered by our firm.

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

Investment Management Services provided by Game Plan include portfolio construction, asset allocation, monitoring, and review of the client’s portfolio. After an interview is conducted, Game Plan will review the client’s individual needs, goals, time horizons, risk tolerance, risk capacity, desired strategies, net worth, net income, age, tax situation and various other factors. Game Plan utilizes the information provided by the client to provide recommendations for investments that may include planning for long-range goals or other segments of an investment plan that may be desired.

## **D. Wrap Fee Programs**

Game Plan does not sponsor or manage a wrap fee program.

## **E. Amount of Assets Under Management**

Game Plan manages accounts on a discretionary basis. As of December 31, 2023, the Firm had \$117,038,402 total discretionary assets under management.

## **ITEM 5: FEES**

### **A. Description of Compensation and Basic Fee Schedule**

#### **Investment Management Fees**

Investment Management Fees (“Advisory Fees”) are payable quarterly, in advance, and such fees may be deducted from the client's account(s) within 30 days following the end of the quarter for which said fees will be incurred. Investment Management Fees may be paid directly by the client.

Advisory Fee Schedule ranges from .25% to 3% as agreed upon by both parties. Fees for Investment Management Services may be modified depending upon the size of the portfolio, complexity of services required or individual circumstances, and at the discretion of Game Plan. The billing of fees for the initial quarter may be deferred until the end of the initial quarter and will be adjusted pro-rata based upon the number of calendar days in the calendar quarter that the Agreement goes into effect. Fees are calculated as follows:

$$\text{\$Prior Quarter Ending Balance*} \quad \times \quad \text{Agreed Upon \% / 365} \times \text{Days in Quarter} \quad = \text{\$Fee}$$

\* The value established by the custodian on the last business day of the calendar quarter will be used in determining the “assets under management.”

All advisory fees are negotiable. Advisory fees are not collected for services to be performed more than six months in advance. Advisory fees are agreed upon at the time of engagement.

Investment Management Fees may be paid directly by the client. For all discretionary accounts, Game Plan maintains a Limited Power of Attorney for the purposes of directing and or otherwise effecting investments on behalf of the managed account, for the direct payment of Game Plan’s fees and or the payment of commissions, custodial fees and or other charges incurred by the managed account.

### **Financial Planning and Investment Consultation**

#### **Financial Planning**

Fees for financial planning can be billed hourly or on a fixed amount and are based upon an estimate of the total time needed to prepare the plan. The Financial Planning Fee will be agreed upon and disclosed within the financial planning and advice agreement and will normally range from \$1500.00 to \$5000.00 based upon the complexity of the planning case. Financial planning fees are non-refundable and may be discounted at the Firm’s discretion.

#### **401(k) Advisory Services**

Fees for 401(k) Advisory Services are be billed at a negotiated rate of up to \$1,050.00 per year. Participants who utilize the 401(k) Advisory Services will be permitted to receive Financial

Planning at a reduced rate of \$500 at the discretion of the Firm. This Financial Planning fee shall be separate from, and in addition to, your 401(k) Advisory Services Fee and will be payable at the point of sale.

Fees will be due and payable as agreed upon by both parties. Fees billed on a monthly, quarterly, or annual basis as disclosed within the agreement. All 401(k) Advisory Services fees are billed in advance. Either party may immediately terminate services upon written notice. 401(k) Advisory Services fees are non-refundable.

#### **Investment Consultation**

Fees for investment consultation services can be billed at a rate of up to \$500 per hour, quarterly based on the value of the account under advisement or included as part of the overall annual planning fee as agreed upon between the Firm and the client. Fees billed on an hourly basis will be based on an estimate of the total time needed and provided to the client prior to engagement. The Investment Consultation Fee will be agreed upon and disclosed within the agreement. Fees will be due and payable as agreed upon by both parties. Either party may immediately terminate consultation services upon written notice. Investment consultation fees are non-refundable.

#### **Publications and Education**

As stated earlier, Game Plan may provide a newsletter to advisory clients free of cost or obligation. Game Plan may charge a fee for seminars or educational courses and would have such costs outlined in the invitation. The cancellation provisions would also be noted in the invitation.

#### **Turnkey Asset Management Program Services Fees**

Separate from and addition to the Investment Management Fees, clients involved in a TAMP will be charged an asset-based fee ranging from 0.13% to 0.85% of assets under management, which include Sherman's fees. Fees shall be billed quarterly, in advance, according to the following method:

$$\text{\$Prior Quarter Ending Balance*} \quad \times \quad \text{Agreed Upon annual fee/4} \quad = \text{\$Fee}$$

\* The value established by the custodian on the last business day of the calendar quarter will be used in determining the "assets under management."

The TAMP fee shall vary depending on sleeve allocation/portfolio weighting at the time of billing and the acceptable level of drift as detailed in Item 4. In no event shall the aggregate of the Investment Management Fee and the TAMP fee exceed 3%. In the event that the aggregate of the Investment Management Fee and the TAMP fee would exceed 3%, the fee shall be lowered to 3% and the Investment Management Fee shall be reduced to compensate for the TAMP fee. TAMP fees may be deducted from the client's account(s) within 30 days following the end of the quarter for which said fees will be charged.

The overall TAMP Fee may be reduced if a greater portion of the Adviser's Assets Under Management is managed through the TAMP. Therefore, an inherent conflict of interest exists as



we are incentivized to place a greater portion of our client in the TAMP in order to have the ability to offer a lower fee to all TAMP clients. This is mitigated by the fact that we do not receive any additional compensation from this conflict. However, we act as a fiduciary and are obligated to place your interests ahead of our own at all times. Our Chief Compliance Officer, Chris Wootton ensures that we act according to our client's best interest at all times. In addition, we will inform you that you are under no obligation to use the TAMP or any third-party of our choosing.

## **B. Other Fees**

The aforementioned advisory fees are for Game Plan advisory services only. All fees paid to Game Plan for advisory services are separate from the fees and expenses charged to shareholders of mutual funds and ETFs by the mutual funds or ETFs. A complete explanation of these expenses charged is contained in the prospectus for each fund or ETF. No portion of such fees are payable to Game Plan. Clients are encouraged to read each prospectus. Clients may also bear certain charges imposed by third parties other than Game Plan in connection with investments made through their accounts including, but not limited to, servicing fees, and IRA or Qualified Retirement Plan Fees. Fees may be higher or lower than fees charged by other investment advisers for similar services. A current list of transaction fees is available upon request.

The Firm does not receive any compensation from any outside advisers.

## **C. Prepayment of Fees**

Fees are not collected for services to be performed more than six months in advance and in excess of \$1,200.00. This agreement may be terminated at any time and without penalty upon receipt of written notice by either party. If this agreement is terminated within five business days of inception, the client is entitled to a full refund of any pre-paid Advisory Fees. If the agreement is terminated after the initial five days of its inception, the client will be entitled to a pro rata refund of any pre-paid Advisory Fees based upon the number of days remaining in the quarter after termination.

## **D. Other Compensation**

Neither the Adviser nor its supervised persons accept any compensation/commission for the recommendation of securities or non-securities products including asset-based sales charges or service fees from the sale of mutual funds or insurance products in advisory accounts.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Game Plan does not charge any performance-based fees or fees that are based on a share

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of capital gains on or capital appreciation of the assets of a client.

## **ITEM 7: TYPES OF CLIENTS**

Game Plan provides portfolio management services primarily to individuals and high net worth individuals. Clients using our TAMP have a minimum account size of \$25,000.

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

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

Game Plan uses computer models, economic and data research, as well as other indicators to monitor changing conditions and risk levels in the economy and financial markets. Multiple indicators and methods are used to reduce risk of reliance on a single indicator, system or method. Methods include economic analysis, stock analysis, asset class analysis, trend analysis, fundamental analysis, technical analysis, spreadsheet models, formulas and data analysis, sentiment indicators, and ongoing research and development in sophisticated investing strategies. Game Plan's investment information may come from one or more market signal services.

### **B. Material Risks**

Clients should be aware that investing in securities involves risk of loss that they should be prepared to bear. Reallocations, exchanges and sales of securities will create taxable events except when tax-exempt or tax deferred accounts or vehicles are used. Game Plan gives priority to investment decisions over tax decisions and personal tax consequences for our clients are not a primary consideration. Game Plan does not promise or guarantee profits.

### **C. Certain Risk Factors**

All investments carry some amount of risk. Game Plan's investment strategies may be subject to the following principal investment risks:

**Credit Risks** – The risk that the portfolio could lose money if the issuer of guarantor of a fixed-income security, or the counter-party to a derivative contract, is unable or unwilling to meet its financial obligations.

**Counter-Party Risks** – A portfolio may incur a loss if the other party to an investment contract, such as a derivative, fails to fulfill its contractual obligation.

**Currency Risks** – The risk that foreign currencies will decline in value relative to the US dollar and affect a portfolio's investments in foreign (non-US) currencies or in securities

that trade in, and receive revenues in, or in derivatives that provide exposure to, foreign (non-US) currencies.

**Debt Securities Risks** – The issuer of a debt security may fail to pay interest or principal when due, and changes in market interest rates may reduce the value of debt securities or reduce the portfolio's returns.

**Derivatives Risks** – The use of derivatives such as futures, options and swap agreements can lead to losses, including those magnified by leverage, particularly when derivatives are used to enhance return rather than offset risk.

**Emerging-Markets Risk** – Foreign investment risks are typically greater for securities in emerging markets, which can be more vulnerable to recessions, currency volatility, inflation and market failure.

**Equity Risks** – The risk that the value of equity securities, such as common stocks and preferred stocks, may decline due to general market conditions which are not specifically related to a particular company or to factors affecting a particular industry or industries. Equity securities generally have greater price volatility than fixed income securities.

**ETF Risks** – A portfolio will be exposed indirectly to all of the risks of securities held by an ETF.

**Foreign Investment Risk** – Foreign investments face the potential of heightened illiquidity, greater price volatility and adverse effects of political, regulatory, tax, currency, economic or other macroeconomic developments.

**High-Yield Securities Risk** – High-yield securities have a much greater risk of default or of not returning principal and tend to be more volatile than higher-rated securities of similar maturity.

**Interest-Rate Risk** – The risk that fixed income securities will decline in value because of an increase in interest rates.

**Issuer Risk** – The value of a security may decline because of adverse events or circumstances that directly relate to conditions at the issuer or any entity providing it credit or liquidity support.

**Issuer Non-Diversification Risk** – The risks of focusing investments in a small number of issuers, industries, or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.

**Leverage Risk** – The risk that certain portfolio transactions may give rise to leverage, causing the portfolio to be more volatile than if it had not been leveraged.

**Leveraged/Inverse ETF Risk**- Leveraged ETFs seek to deliver multiples of the performance of the index or benchmark they track. Inverse ETFs (also called “short” funds) seek to deliver the opposite of the performance of the index or benchmark they track. Like traditional ETFs, some leveraged and inverse ETFs track broad indices, some are sector-specific, and others are linked to commodities, currencies, or some other benchmark. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward moving markets. Leveraged inverse ETFs (also known as “ultra-short” funds) seek to achieve a return that is a multiple of the inverse performance of the underlying index. An inverse ETF that tracks a particular index, for example, seeks to deliver the inverse of the performance of that index, while a 2x (two times) leveraged inverse ETF seeks to deliver double the opposite of that index’s performance. To accomplish their objectives, leveraged and inverse ETFs pursue a range of investment strategies through the use of swaps, futures contracts, and other derivative instruments. Most leveraged and inverse ETFs “reset” daily, meaning that they are designed to achieve their stated objectives on a daily basis. Their performance over longer periods of time — over weeks or months or years — can differ significantly from the performance (or inverse of the performance) of their underlying index or benchmark during the same period of time. This effect can be magnified in volatile markets.

**Liquidity Risk** – A security may not be able to be sold at the time desired or without adversely affecting the price.

**Market Risk** – The market price of securities held by a portfolio may rapidly or unpredictably decline due to factors affecting securities markets generally or particular industries.

**Mortgage- and Asset-Backed Securities Risk** – These securities may decline in value when defaults on the underlying mortgage or assets occur and may exhibit additional volatility in periods of changing interest rates. When interest rates decline, the prepayment of mortgages or assets underlying such securities may require the reinvestment of money at lower prevailing interest rates, resulting in reduced returns.

**Regulatory Risk** – The risk that changes in government regulations may adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

**Short Sale Risk** – The risk of entering into short sales includes the potential loss of more money than the actual cost of the investment, and the risk that the third party to the short sale may fail to honor its contract terms, causing a loss to a portfolio.

Private Securities Risk – Private securities contain the risks of their respective public securities, but these risks can be magnified due to their illiquidity and lack of public knowledge on the business. These securities are inherently riskier.

Real Estate Risk – The real estate market has experienced some large swings recently. Due to changes in interest rates, the lending market, economic policy, and supply and demand, in addition to illiquidity, real estate investments can carry a great deal of risk.

## **ITEM 9: DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Game Plan or the integrity of Game Plan's management.

### **A. Criminal or Civil Action**

Neither Game Plan, nor any of its management persons, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

### **B. Administrative Procedure**

Neither Game Plan, nor any of its management persons, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

### **C. Self-Regulatory Organization**

Neither Game Plan, nor any of its management persons, has had any proceedings before any self-regulatory organizations.

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

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

The Advisory Representatives of Game Plan concentrate their efforts toward financial planning and investment advisory services. The Advisory Representatives of Game Plan are not registered with a broker/dealer. The Advisory Representatives of Game Plan are licensed to provide

insurance services to clients. Insurance products are provided to clients for personal, estate and business needs. These activities are estimated to utilize less than 10% of the representative's time.

## **B. Registration as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Adviser**

Neither Game Plan nor its Advisory Representatives are registered as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Adviser.

## **C. Registration Relationships Material to This Advisory Business and Conflicts of Interest**

Christopher Wootton has material ownership in Wootton Financial Group, Inc., a company involved in the sale of fixed insurance products. The company receives compensation from the direct sale of fixed insurance products and shares in commissions from the sales of fixed insurance products by other financial professionals. These activities are estimated to utilize less than 10% of Mr. Wootton's time. The Firm will make the necessary disclosures to each client of any potential conflict of interests that arises from this relationship.

## **D. Selection of Other Advisors of Managers**

Game Plan does not currently select other investment advisers for its clients.

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

## **A. Code of Ethics**

Game Plan has adopted a Code of Ethics to ensure that securities transactions by Game Plan employees are consistent with Game Plan's fiduciary duty to its clients and to ensure compliance with legal requirements and Game Plan's standards of business conduct. Game Plan requires transaction confirmation and quarterly reporting. A written copy of Game Plan's Code of Ethics is available upon request.

Game Plan will maintain a record of required personal securities transactions. All applicable rules of the Securities and Exchange Commission will be strictly enforced. Game Plan will not permit insider trading.

## **B. Recommendations Involving Material Financial Interests**

To prevent conflicts of interest, all employees of Game Plan must comply with Game Plan's Written Supervisory Procedures and Code of Ethics, which impose restrictions on the purchase or sale of securities for their own accounts and the accounts of certain affiliated persons.

## **C. Investing in the Same Securities as Clients**

No security may be bought or sold by a principal or employee of Game Plan before Game Plan's clients' accounts have had the opportunity to make such transactions as appropriate. All Game Plan principal and employee trades will be reviewed by the compliance officer. Principals and employees will not receive a more favorable execution price on a particular day than those received by Game Plan's investment advisory clients. It is Game Plan's policy that the Firm will not effect any principal or agency cross securities transactions for client accounts. Game Plan will also not cross trades between client accounts.

## **D. Trading the Same Securities as Clients' Securities**

Notwithstanding the above, Game Plan, and/or its officers, directors or employees may purchase for themselves similar or different securities as are purchased or recommended for investment advisory clients of Game Plan, and that different security transactions may be affected or recommended for different investment advisory clients of Game Plan.

# **ITEM 12: BROKERAGE PRACTICES**

## **Selecting Brokerage Firms**

Game Plan will maintain discretion over Investment Management accounts as evidenced by the Client Agreement. Game Plan will not have discretionary authority to withdraw funds or take custody of a client's funds or securities.

Game Plan will supervise and direct the investments of our clients' accounts subject to such limitations as our clients may impose in writing. Game Plan as agent and attorney-in-fact with respect to the client's account, when it deems appropriate, without prior consultation with the client, may, (a) direct the purchase, sale, exchange, conversion, and otherwise trade in stocks, bonds and other securities including money market instruments, and (b) place orders for the execution of such securities transactions. Game Plan will allocate brokerage transactions in a manner it believes to be fair and responsible to its clients and consistent with its clients' objectives. The Representatives and Associated Persons of Game Plan realize that the sharing of non-public personal information is an act of trust and take this issue very seriously. All information provided

by clients to Game Plan and information and advice furnished by the Firm to clients shall be treated as confidential and shall not be disclosed to non-affiliated third parties, except as permitted by clients with written authorization, or as required by any rule, regulation or law of any regulatory or self-regulatory organization of which Game Plan or its Associated Persons may be subject. It is the policy of the Firm to restrict access to records to only those associates who need to have such information in order to deliver the financial planning, investment advisory or administrative services of the Firm. The Firm secures its offices during non-business hours.

We require our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor.

#### 1. Research and Other Soft Dollar Benefits

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business.

- Services that Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.
- Services that May Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
  - provide access to client account data (such as duplicate trade confirmations and account statements);



- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.
- Services that Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
  - educational conferences and events
  - technology, compliance, legal, and business consulting;
  - publications and conferences on practice management and business succession; and
  - access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

## 2. Brokerage for Client Referrals

Game Plan does not consider whether it receives referrals from broker/dealers when it selects or recommends broker/dealers to its clients. The Firm bases its recommendations on the client's needs and what is in the best interests of the clients when it recommends or selects a broker/dealer.

## 3. Directed Brokerage

Game Plan does not maintain agreements with referring broker/dealers regarding its internal allocation of brokerage transactions. However, all or a sizable portion of a particular client's brokerage transaction business will be directed to Schwab. Although Game Plan is confident that Schwab will provide both the clients and the Firm with excellent service, the selection of the Firm may not result in best execution in all cases.

## **B. Aggregation of Securities for Multiple Client Accounts**

When trading the same security across multiple accounts, Game Plan may aggregate or place a block trade and allocate the order to each client accordingly. When executing this type of order, the execution price will "average priced" so that each client receives the same execution price and avoid any potential conflicts of interest. If an employee of Game Plan is included in the order, Game Plan will ensure that the employee account does not receive a better price than the client.

Game Plan will be responsible for all trading errors should they occur. The commission amount and per share commission rate will differ among clients with directed brokerage relationships due to the dollar value and the size (number of shares) of the trade for each account and the total relationship between the client and their broker/dealer. Because each client may differ in portfolio size, investment objective, equity exposure and the extent of the relationship with their broker, Game Plan does not negotiate commission discounts on the block transaction itself.

## **ITEM 13: REVIEW OF ACCOUNTS**

### **A. Periodic Reviews**

Investment Management involves periodic monitoring and review of portfolio assets. Investment management services entail quarterly internal reviews. Reviews will be conducted by Chris Wootton. Mr. Wootton will review investment results, asset allocation, client objectives and other variables that may have been identified during the course of the engagement. Game Plan advises clients to immediately notify the Firm of any changes to client's financial status in the event there needs to be a change in client's investment plan. Otherwise, personal meetings with clients to review investment results and strategies are performed at client's discretion.

### **B. Factors that Will Trigger Non-Periodic Reviews**

These reviews may occur more frequently, depending upon the underlying assets in the portfolios, market conditions or as desired by the client.

### **C. Reports Provided to Clients**

Clients receive standard account statements from investment sponsors and brokerage firms monthly or quarterly, depending upon the custodian utilized.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. Third Party Compensation**

Game Plan does not provide compensation either directly or indirectly to any non-supervised person for referrals. Additionally, the Firm does not receive any economic benefits from any non-clients for providing investment advice to Game Plan's clients.

## **B. Referrals**

Game Plan may receive referrals from Sherman through our TAMP relationship.

### **ITEM 15: CUSTODY**

Game Plan does not maintain custody of its clients' funds or securities. Clients should receive at least quarterly statements from the broker/dealer, bank or other qualified custodian that holds and maintains clients' investment assets. Game Plan urges its clients to carefully review such statements and compare such official custodial records to the account statements that it may provide. Game Plan's statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **ITEM 16: INVESTMENT DISCRETION**

Game Plan usually receives written discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities, and determining amounts, Game Plan observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Game Plan in writing.

### **ITEM 17: VOTING CLIENT SECURITIES**

Game Plan shall not take any action or render any advice with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities held in client accounts.

### **ITEM 18: FINANCIAL INFORMATION**

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about their financial condition. Game Plan is well capitalized, has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

## **A. Balance Sheet**

Game Plan does not require nor solicit prepayment of investment advisory fees which would result in custody issues. Therefore, the Adviser is not required to include a balance sheet with this brochure.

## **B. Financial Conditions**

Neither Game Plan nor its management have any financial conditions that are likely to reasonably impair the Adviser's ability to meet contractual commitments to clients.

## **C. Bankruptcy Petitions**

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

## **Professional Designations**

Certain Game Plan IARs may be Chartered Financial Consultants ("ChFC®"). A description of this professional designation is as follows:

The ChFC® designation is the end certification of the Chartered Financial Consultant program. This program is comprised of nine or more college-level courses on nearly all aspects of financial planning. It is offered by The American College, a non-profit educator with the highest level of academic accreditation.

**Issuing Organization:** The American College issues this designation.

**Prerequisites/Experience Required:** Three years of full-time business experience are required within the five years preceding the awarding of the designation.

**Educational Requirements:** Seven core and two elective courses are required for this designation.

**Examination Type:** A final proctored exam for each course.

**Continuing Education/Experience Requirements:** An individual with a ChFC® designation must complete 30 CE credit hours every two years in order to maintain their designation.