

Global Portfolio Solutions, Inc. d/b/a GPS Investments

Form ADV Part 2A – Disclosure Brochure

Effective: October 1, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Global Portfolio Solutions, Inc. (“GPS Investments” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (602) 558-1211 or by email at gpsinvest@gpsinvest.com.

GPS Investments 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 GPS Investments to assist you in determining whether to retain the Advisor.

Additional information about GPS Investments and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 333381.

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Item 2 – Material Changes

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 the Advisory Persons of GPS Investments. For convenience, the Advisor has combined these documents into a single disclosure document.

GPS Investments believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. GPS Investments encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

GPS Investments is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you 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 by searching with the Advisor's firm name or CRD# 333381. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (602) 558-1211 or by email at gpsinvest@gpsinvest.com.

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Item 4 – Advisory Services

A. Firm Information

Global Portfolio Solutions, Inc. (“GPS Investments” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Corporation under the laws of the State of Arizona. GPS Investments was founded in December 1998 and became a registered investment advisor in October 2024. The Advisor is owned by William J. Jones (Founder and Chief Executive Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by GPS Investments.

B. Advisory Services Offered

GPS Investments offers investment advisory services to individuals, high net worth individuals, 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. GPS Investments' fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Wealth Management Services

GPS Investments provides customized wealth management services for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management services and a broad range of comprehensive financial planning. These services are listed below.

Investment Management Services – The Advisor provides discretionary investment management services. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. GPS Investments works closely with each Client to identify their investment goals and objectives, risk tolerance and financial situation in order to create a portfolio strategy. GPS Investments will then construct an investment portfolio consisting of stocks, bonds, low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”), alternative investments, and/or independent managers to achieve the Client's investment goals. The Advisor may also retain other types of securities based on a Client's legacy investments due to portfolio fit and/or tax considerations.

GPS Investments' investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. GPS Investments 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.

GPS Investments evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. GPS Investments may recommend, on occasion, redistributing investment allocations to diversify the portfolio. GPS Investments 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.

GPS Investments 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.

Retirement Accounts – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or

recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

Participant Account Management – As part of the Advisor's Investment Management Services, the Advisor may use a third-party platform to facilitate the discretionary investment management of held away assets such as 401(k), 403(b) and other defined contribution plan participant accounts. The platform enables the Advisor to gain access to the Client account[s] without having access through the Client's login credentials. The Client will be provided an electronic link that will allow the connection of Client account[s] to the platform. The Advisor is not affiliated with the platform and does not receive any compensation from the platform.

Financial Planning Services – GPS Investments will provide financial planning and consulting services to Clients as part of its overall wealth management services and wealth management agreement. GPS Investments may also provide standalone financial planning pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. 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.

GPS Investments may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. The Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For certain standalone financial planning engagements, the Advisor may not provide a written summary. Plans or consultations for standalone financial planning engagements are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of 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.

Use of Independent Managers – The Advisor may recommend, based on the Client's needs and objectives, that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Client's investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

C. Client Account Management

Prior to engaging GPS Investments to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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

D. Wrap Fee Programs

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

E. Assets Under Management

GPS Investments is a newly established advisor. Assets under management shall be reported with the Advisor's next filing of this Disclosure Brochure. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

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 one or more written agreements with the Advisor.

A. Fees for Advisory Services

Wealth Management Services

Wealth management fees are paid quarterly in advance pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$500,000	1.30%
\$500,001 to \$1,500,000	1.10%
\$1,500,001 to \$3,000,000	1.00%
\$3,000,001 to \$5,000,000	0.90%
\$5,000,001 and up	0.80%

The wealth management 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 GPS Investments will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing. The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning Services

GPS Investments offers standalone financial planning services for a fixed engagement fee ranging from \$1,500 to \$10,000 per engagement. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total costs will be determined prior to engaging for these services.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. The Advisor will earn its wealth management fee as described above. Independent Managers will charge a separate investment management and/or platform fee. For certain Independent Manager relationships, the Advisor is compensated through a referral fee arrangement, whereby the Advisor is compensated when a Client engages with the Independent Manager.

B. Fee Billing

Wealth Management Services

Wealth management 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 beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with GPS Investments at the end of the prior quarter. Clients may make additions to and withdrawals from account[s] at any time. However, reconciliations are performed on a monthly basis to capture if, at any point, assets in excess of \$50,000 are deposited into or withdrawn from an account after the start of the billing period to reflect the interim change in portfolio value from the date of the deposit/withdrawal until the end of the quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by GPS Investments to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees for standalone engagements will be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Financial planning fees may be paid via check or ACH payment.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees will include the Advisor's wealth management fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. Depending on the relationship, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than GPS Investments, 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, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by GPS Investments are separate and distinct from these custody and execution fees.

In addition, all fees paid to GPS Investments 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 GPS Investments, but would not receive the services provided by GPS Investments 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 GPS Investments 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

Wealth Management Services

GPS Investments may be compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, 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. Upon termination, 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.

Financial Planning Services

GPS Investments requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning 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 billed for the percentage of the engagement scope completed by the Advisor and the Advisor will refund any unearned, prepaid planning fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. The Advisor will assist the Client with the termination and transition as appropriate.

E. Compensation for Sales of Securities

GPS Investments does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Broker Dealer Affiliation

Certain Advisory Persons are also Registered Representatives of Mutual Securities, Inc. ("MSI"). MSI is a registered broker-dealer (CRD# 13092), member FINRA, SIPC. In one's separate capacity as a Registered Representative, the Advisory Person will implement securities transactions under MSI and not through the Advisor. In this capacity, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by the Advisory Person in one's capacity as a Registered Representative is separate and in addition to investment advisory fees. This practice presents a conflict of interest because the Advisory Person who is a Registered Representative has an incentive to effect securities transactions for the purpose of generating commissions. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a Registered Representative. Please see Item 10 below.

Insurance Agency Affiliation

Certain Advisory Persons are licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products offered to Clients. Insurance commissions earned by the Advisory Person are separate and in addition to investment advisory fees. This practice presents a conflict of interest as an Advisory Person who is also an insurance professional will have an incentive to recommend insurance products to the Client for the purpose of generating commissions. Clients are under no obligation, contractual or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 below.

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

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

GPS Investments 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

GPS Investments offers investment advisory services to individuals, high net worth individuals, trusts, and retirement plans. GPS Investments generally does not impose a minimum relationship size.

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

A. Methods of Analysis

GPS Investments primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from GPS Investments are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, 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.

As noted above, GPS Investments generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. GPS Investments will typically hold all or a portion of a security 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, GPS Investments 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. GPS Investments 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. 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.

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 the 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 investment 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.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

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.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

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

There are no legal, regulatory or disciplinary events involving GPS Investments or its management persons. GPS Investments values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 333381.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

As noted in Item 5, certain Advisory Persons are also Registered Representatives of MSI. In one's separate capacity as a Registered Representative, Advisory Persons will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a Registered Representative.

Insurance Agency Affiliation

As noted in Item 5, certain Advisory Persons are licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with the Advisor. As an insurance professional, the Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset investment advisory fees. This practice presents a conflict of interest as an Advisory Person who is also an insurance professional will have an incentive to recommend insurance products to the Client for the purpose of generating commissions. Clients are under no obligation to implement any recommendations made by the Advisor or Advisory Persons.

Temporary Dual Investment Advisor Affiliation

On a temporary basis, certain Advisory Persons of GPS Investments will be dually registered with Mutual Advisors, LLC (CRD# 167658) as investment advisor representatives. These Advisory Persons are maintaining registration with Mutual Advisors, LLC as they work to transition Clients to GPS Investments.

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

A. Code of Ethics

GPS Investments has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with GPS Investments ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. GPS Investments and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of GPS Investments' 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 the Code, please contact the Advisor at (602) 558-1211 or via email at gpsinvest@gpsinvest.com.

B. Personal Trading with Material Interest

GPS Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. GPS Investments 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. GPS Investments does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

GPS Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has 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 have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can 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 GPS Investments requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While GPS Investments allows 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 GPS Investments, or any Supervised Person of GPS Investments, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

GPS Investments 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 GPS Investments to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, GPS Investments does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where GPS Investments does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. 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 GPS Investments. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. GPS Investments 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, and its reputation and/or the location of the Custodian's offices.

GPS Investments will generally recommend that Clients establish their account[s] with Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"), a FINRA-registered broker-dealer and member SIPC. GPS Investments has established an institutional relationship with Fidelity to serve as the Client's "qualified custodian" and assist the Advisor in managing Client account[s].

As Registered Representatives of MSI, the Advisor may be limited in using other broker-dealers/custodians as MSI must approve the use of any outside broker-dealer/custodian.

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. **GPS Investments does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - GPS Investments 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 GPS Investments 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]. 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]). GPS Investments 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 the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. GPS Investments will execute its transactions through the Custodian as authorized by the Client. GPS Investments 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 Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons and periodic reviews by Trevor R. Cross, Chief Compliance Officer of GPS Investments. 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 GPS Investments 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

A. Compensation Received by GPS Investments

GPS Investments does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. GPS Investments may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, GPS Investments may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

As noted in Item 12, GPS Investments has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. As part of the arrangement, Fidelity also makes available to the Advisor certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies. The Advisor may also receive additional services and support from Fidelity. As a result of receiving such services the Advisor has an incentive to continue to use or expand the use of Fidelity's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship with Fidelity remains in the best interests of the Advisor's Clients in connection with its fiduciary obligations, including its duty to seek best execution. Please see Item 12 above. The Advisor receives access to software, vendors, and related support without cost or at a discount because the Advisor renders wealth management services to Clients that maintain assets at Fidelity. The software and related systems support benefit the Advisor and indirectly benefit the Clients. However, all services provided may not be utilized for all 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 these economic benefits from Fidelity creates a conflict of interest as these economic benefits may influence the Advisor's recommendation of Fidelity as a Custodian over another custodian that does not furnish similar software, systems, back-office support, financial support, and/or other economic benefits. Notwithstanding the conflicts noted herein, the Advisor firmly believes that Fidelity provides the

Client and the Advisor with excellent value and support.

As noted in Item 4, the Advisor recommends that Clients utilize the investment management services of Independent Managers. For certain Independent Manager relationships, the Advisor will receive referral compensation from the Independent Manager for which the Client engages for investment management services.

B. Compensation for Client Referrals

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

Item 15 – Custody

GPS Investments does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct GPS Investments to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by GPS Investments to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

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

GPS Investments 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 GPS Investments. 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 GPS Investments will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

GPS Investments 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

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

Form ADV Part 2B – Brochure Supplement

for

William J. Jones, CFP®
Founder and Chief Executive Officer

Effective: October 1, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of William J. Jones, CFP® (CRD# 1943251) in addition to the information contained in the Global Portfolio Solutions, Inc. (“GPS Investments” or the “Advisor”, CRD# 333381) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the GPS Investments Disclosure Brochure or this Brochure Supplement, please contact us at 6025581211 or by email at gpsinvest@gpsinvest.com.

Additional information about Mr. Jones is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1943251.

Item 2 – Educational Background and Business Experience

William J. Jones, CFP®, born in 1959, is dedicated to advising Clients of GPS Investments as the Founder and Chief Executive Officer. Mr. Jones earned his Bachelor of Science Degree from Arizona State University in 1985. Additional information regarding Mr. Jones' employment history is included below.

Employment History:

Founder and Chief Executive Officer, Global Portfolio Solutions, Inc.	11/2024 to Present
Registered Representative, Mutual Securities, Inc.	01/2021 to Present
Financial Advisor, Mutual Advisors, LLC	01/2021 to Present
Registered Representative, MML Investors Services, LLC	10/1997 to 01/2021
Agent, Massachusetts Mutual Life Insurance Co.	09/1997 to 01/2021

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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 87,000 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®.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Jones. Mr. Jones 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. Jones.

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. Jones.***

However, we do encourage you to independently view the background of Mr. Jones on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1943251.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Jones is also a registered representative of Mutual Securities, Inc. ("MSI"). MSI is a registered broker-dealer (CRD# 13092), member FINRA, SIPC. In Mr. Jones' separate capacity as a registered representative, Mr. Jones will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Jones. Neither the Advisor nor Mr. Jones will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Jones' separate capacity as a registered representative. Mr. Jones spends approximately 10% of his time per month in his role as a registered representative of MSI.

Insurance Agency Affiliations

Mr. Jones is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Jones' role with GPS Investments. As an insurance professional, Mr. Jones will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Jones is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Jones or the Advisor. Mr. Jones spends approximately 10% of his time per month in this capacity.

Temporary Investment Advisor Affiliation

Mr. Jones will be dually registered with Mutual Advisors, LLC ("Mutual Advisors") as an investment advisor representative. Mr. Jones is maintaining his registration with Mutual Advisors as he works to transition Clients to GPS Investments. Following the Client transition, this dual affiliation will cease.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Jones serves as the Founder and Chief Executive Officer of GPS Investments and is supervised by Trevor Cross, the Chief Compliance Officer. Mr. Cross can be reached at (602) 558-1211.

GPS Investments has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of GPS Investments. Further, GPS Investments is subject to regulatory oversight by various agencies. These agencies require registration by GPS Investments and its Supervised Persons. As a registered entity, GPS Investments is subject to examinations by regulators, which may be announced or unannounced. GPS Investments 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

Trevor R. Cross
Senior Manager and Chief Compliance Officer

Effective: October 1, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Trevor R. Cross (CRD# 6977085) in addition to the information contained in the Global Portfolio Solutions, Inc. (“GPS Investments” or the “Advisor”, CRD# 333381) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the GPS Investments Disclosure Brochure or this Brochure Supplement, please contact us at 6025581211 or by email at gpsinvest@gpsinvest.com.

Additional information about Mr. Cross is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6977085.

Item 2 – Educational Background and Business Experience

Trevor R. Cross, born in 1996, is dedicated to advising Clients of GPS Investments as the Senior Manager and Chief Compliance Officer. Mr. Cross earned a Bachelor of Science in Business Administration from Illinois State University in 2018. Additional information regarding Mr. Cross' employment history is included below.

Employment History:

Financial Advisor and Chief Compliance Officer, Global Portfolio Solutions, Inc.	11/2024 to Present
Financial Advisor, Mutual Advisors, LLC	03/2021 to Present
Registered Representative, Mutual Securities, Inc.	03/2021 to Present
Investment Advisor Representative, MML Investors Services, LLC	07/2019 to 03/2021
Registered Representative, MML Investors Services, LLC	03/2019 to 03/2021

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Cross. Mr. Cross 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. Cross.

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. Cross.***

However, we do encourage you to independently view the background of Mr. Cross on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6977085.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Cross is also a registered representative of Mutual Securities, Inc. ("MSI"). MSI is a registered broker-dealer (CRD# 13092), member FINRA, SIPC. In Mr. Cross' separate capacity as a registered representative, Mr. Cross will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Cross. Neither the Advisor nor Mr. Cross will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Cross' separate capacity as a registered representative. Mr. Cross spends approximately 10% of his time per month in his role as a registered representative of MSI.

Insurance Agency Affiliations

Mr. Cross is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Cross' role with GPS Investments. As an insurance professional, Mr. Cross will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Cross is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Cross or the Advisor. Mr. Cross spends approximately 10% of his time per month in this capacity.

Temporary Investment Advisor Affiliation

Mr. Cross will be dually registered with Mutual Advisors, LLC ("Mutual Advisors") as an investment advisor representative. Mr. Cross is maintaining his registration with Mutual Advisors as he works to transition Clients to GPS Investments. Following the Client transition, this dual affiliation will cease.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Cross serves as the Senior Manager and Chief Compliance Officer of GPS Investments. Mr. Cross can be reached at 6025581211.

GPS Investments has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of GPS Investments. Further, GPS Investments is subject to regulatory oversight by various agencies. These agencies require registration by GPS Investments and its Supervised Persons. As a registered entity, GPS Investments is subject to examinations by regulators, which may be announced or unannounced. GPS Investments 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

Effective: October 1, 2024

Our Commitment to You

Global Portfolio Solutions, Inc. ("GPS Investments" 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. GPS Investments (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.

GPS Investments 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?
Servicing our Clients 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. We share information with Mutual Securities, Inc. ("MSI"). This sharing is due to the oversight MSI has over certain Supervised Persons of our firm. You may contact us at any time for a copy of MSI's Privacy Policy.	Yes	No
Marketing Purposes GPS Investments 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 GPS Investments or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users 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
Information About Former Clients GPS Investments 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 (602) 558-1211 or via email at gpsinvest@gpsinvest.com.