

Introduction

George McKelvey Co., LLC ("GMCo") is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

GMCo is in the business of managing portfolios with individually tailored investment strategies. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy.

We will manage advisory accounts primarily on a discretionary basis. For discretionary accounts, we will implement transactions without seeking prior client approval, with occasional exceptions, depending on the specific agreement with the client. For non-discretionary accounts, we will seek prior client consent for every contemplated transaction. Therefore, clients with non-discretionary accounts should understand that any delay in obtaining consent may result in different and potentially less favorable transaction terms, including higher security price and/or limited availability of the securities sought. Account supervision is guided by the stated objectives of the client as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients, which can be found by [CLICKING HERE](#).

What fees will I pay?

In some cases, our fees for our Portfolio Management Services are based upon a percentage of assets under management up to a maximum of 1.5% and are calculated annually based upon the billable balance on the portfolio anniversary date including cash balances, and then divided into quarterly payments. The billable balance on the last day of each calendar quarter or another periodic basis may be used to calculate fees, on occasion. In other cases, the fee is calculated in arrears on a quarterly basis, using the average daily balance of the portfolio over the prior quarter. For most clients, portfolio management fees are debited directly from the account on a quarterly basis after the service for that quarter has been completed. In limited circumstance, clients may pay their fees by check.

GMCo includes certain transactional costs in the client's management fee. This arrangement is referred to as a "Wrap Program". For accounts in the Wrap Program, we pay a fee to the custodian based on the clients' transaction costs associated with the purchase or sale of securities. Because of the nature of a Wrap Program, where wrap fees are not tied to an account's frequency of trading and apply to generally all assets in the account, the wrap fee program client may pay more or less than if the client had compensated us outside of the Wrap Program.

We charge Financial Planning Services and Consulting Services on an hourly basis with fees ranging from \$150 to \$350/hour depending upon the complexity of the case and the financial professional working on the matter. In very limited circumstances and at the sole discretion of GMCo, administrative services can be offered at \$100/hour.

GMCo does have an account minimum of \$250,000 which can be waived in the sole discretion of GMCo. All fees are negotiable.

There are a number of other fees that can be associated with holding and investing in securities. For clients participating in GMCo's wrap program, these include some fees that may be paid by GMCo on your behalf, such as transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. All other fees will be deducted from your account. Expenses of a mutual fund or ETF will not be included in management fees, as they are deducted from the value of the shares by the manager. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation by [CLICKING HERE](#).

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Robert McKelvey is a member of various boards, where he serves with or without additional compensation. One or more of these companies may also be an advisory client of our firm. Mr. McKelvey may spend up to 20% of his time on these non-advisory activities. GMCo attempts to mitigate the potential conflict by disclosing it to clients.

An advisor of GMCo is a member of an investment-related family limited liability company which invests in publicly traded securities and real estate. Advisor perform securities research and serve on the investment selection committee for the LLC. GMCo attempts to mitigate this conflict of interest by not allowing clients of GMCo to be solicited or allowed to invest in this entity in addition to disclosing this conflict to clients.

For more specific information regarding compensation and conflicts, please refer our Disclosure Brochure, the ADV Part 2A under Item 10 Outside Affiliations by [CLICKING HERE](#).

How do your financial professionals make money?

Financial professionals of GMCo are paid a portion of the asset management fees collected from clients. Financial professionals are not rewarded sales bonuses.

Do you or your financial professionals have legal or disciplinary history?

No. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS.

Additional Information

Additional information about our investment advisory services can be found at <http://georgemckelvey.com/> or by [CLICKING HERE](#). A copy of our *relationship summary* can also be requested by calling (732) 449-5323.

Conversation Starters

- *“Given my financial situation, should I choose an investment advisory service? Why or why not?”*
- *“How will you choose investments to recommend to me?”*
- *“What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”*
- *“Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”*
- *“How might your conflicts of interest affect me, and how will you address them?”*
- *“As a financial professional, do you have any disciplinary history? For what type of conduct?”*
- *“Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?”*
- *“Who can I talk to if I have concerns about how this person is treating me?”*