



Form ADV Part 2A

Item 1. Cover Page

Garton & Associates Financial Advisors LLC, d/b/a Advantage Investment Management, d/b/a, “AIM”, a Registered Investment Advisor.

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March 26, 2024

This brochure provides information about the qualifications and business practices of Advantage Investment Management. If you have any questions about the contents of this brochure, please contact us at (502) 212-3000 or info@aim-rps.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Advantage Investment Management also is available on the SEC’s website at www.adviserinfo.sec.gov.

The designation Registered Investment Advisor is issued to Advantage Investment Management and does not imply a certain level of skill or training. Federal law requires investment advisory firms and their affiliate members to meet specific registration requirements; complete and file an ADV Part 1 and Part 2; meet minimum capital requirements; and comply with all federal security laws and regulations.

Specifically, for Advantage Investment Management, Managing Partner, Donald L. “Don” Garton holds a CFP[®], CRPC[®], ChFC[®] and CRPS[®]; the firm completes and files form ADV Parts 1, 2A and 2B with the appropriate regulatory agencies; the firm disseminates required notices to clients; the firm maintains a positive net worth; the firm participates in quarterly audits of the firm’s books and records and pays licensing fees assessed by regulatory bodies and government agencies.

Item 2. Material Changes – *This section contains material changes in the firm which have taken place since our last annual update.*

Advantage Investment Management’s ADV Part 2A last annual update was on March 31, 2023. Since the last annual update, one of the firm’s custodians, TD Ameritrade Institutional, which was previously purchased by Charles Schwab & Co., has transitioned all client assets to Schwab’s custody.

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4. Advisory Business – *This section contains information on the advisory business of Advantage Investment Management including ownership; services offered; and how the firm manages clients' money.*

Advantage Investment Management has been helping clients – including individuals, families, businesses, non-profit organizations, pension and profit-sharing plans and plan sponsors, and investment clubs – manage their financial assets since our founding in 2004. Currently there are four financial advisors with over 95 years combined experience guiding thoughtful investing in securities, mutual funds, alternative investments, and many other options to help clients secure their financial future.

Additionally, Advantage Investment Management also provides investment supervisory services, financial planning services, and financial advice to clients not involving securities.

Our services are tailored to fit the present and future financial goals and needs of each client. Investments are chosen based on a variety of factors, including the risk tolerance, time horizon and investment objectives of each client. Client assets are managed on either a discretionary or non-discretionary basis.

For individuals, our investment advisory services include the execution of transactions in a separately managed account (Service Account), as well as other types of accounts that are chosen based on the client's needs. Eligible mutual funds, equities (stocks, rights, warrants), bonds (corporate, government, agency, municipal), Real Estate Investment Trusts (REITs) and options on indexes and equities can be held in the Service Account. These investment descriptions are not an exhaustive list of the types or specific securities that might be offered to clients.

Advisory fees typically include the following services:

- Portfolio illustration and initial investment selections.
- Ongoing rebalancing and repositioning.
- Asset allocation analysis and advice related to the proposed allocation.
- Financial industry news and relevant information provided by your advisor.
- Regular Reports (including quarterly performance reports).
- Year-end tax information.

Our investment advisors may also offer clients information and materials upon request of the client or as needed:

- General financial and investment concepts, such as risk/return, diversification, dollar-cost averaging, compound return and tax-deferred investment.
- Historic difference in rates of return between various assets, asset classes, and indices based on standard market indices.
- Effects of inflation.
- Estimating future retirement income needs.
- Determining investment time horizons.
- Assessing risk tolerance.
- Hypothetical portfolios.
- Asset allocation analysis.

For pension/profit-sharing plan clients, we have a series of steps that exemplify the work we do to add value to group retirement plans:

EVALUATE the current aspects of your plan	Plan design and administration review Investment management review Plan communication and service review
OPTIMIZE plan efficiency and success	Evaluation of the plan's objectives Analysis and recommendations
Serve as your plan's fiduciary advisor helping to PROTECT plan sponsors from penalties and litigation	Assessment Investment policy statement ERISA 401(a) and 404(c) guidance
MANAGE and minimize total plan costs while maximizing the scope and quality of plan provider services	RFP provider analysis and benchmarking Provider pricing re-negotiation Provider contract review
EDUCATE participants for optimal benefits	Employee communications and disclosures Group meetings Individual participant reports
MONITOR and measure success at the plan and participant level on a regular basis	Investment product due diligence Evaluating fund managers and investment strategies Plan reports

Our aim is always to provide exceptional value and guidance for all our clients and help them realize their financial goals and prepare for future needs. As of December 31, 2023, Advantage Investment Management had Assets Under Management of \$159,751,599.64.

Don Garton is the primary owner of Advantage Investment Management, owning 94% of Garton & Associates Financial Advisors, LLC d/b/a Advantage Investment Management.

Current clients will receive a copy of this brochure annually. New clients will also receive a copy of this brochure. If a client has not received this brochure at least 48 hours prior to signing an agreement, the client has 5 business days to cancel an agreement without penalty.

5. Fees and Compensation – *This section contains information on the types of fees clients can be charged; how client fees are charged; the types of compensation the advisor receives; and how potential conflicts of interest are handled.*

Advantage Investment Management is compensated in one of three ways for its advisory services, depending on the services rendered.

Investment Supervisory Services

For investment supervisory services, Advantage Investment Management charges a percentage of assets under management. Fees are assessed quarterly. The value used for the calculation is the value of assets under management on the last business day of each quarter. To obtain the quarterly fee amount, the assets under management are multiplied by the fee percentage of the corresponding tier. The totals are added together and divided by four. The amount is rounded to the nearest dollar and either deducted from the client's Service Account or paid directly during the following quarter unless other arrangements have been established in writing. Clients are billed in arrears.

<u>Assets under Management</u>	<u>Fee as Percentage of Assets under Management</u>
First \$500,000 _____	1.25%
\$500,001 to \$1,000,000 _____	1.00%
\$1,000,001 to \$5,000,000 _____	.90%
\$5,000,001 to \$10,000,000 _____	.80%
\$10,000,001 and up _____	.70%

In some cases, investment supervisory services are part of the financial planning services for a client and are billed directly as part of a financial planning contract.

Company-sponsored qualified retirement plan fees are individually contracted with the sponsoring company and fees weigh a variety of factors including company size, plan assets, needs of the plan sponsors, number of employees, and other factors.

Financial Planning Services

For providing financial planning services, Advantage Investment Management fees are based upon the complexity of the client's financial situation and the services desired by the client. This analysis could include the following areas of financial planning: financial position, protection planning, retirement planning, estate planning, wealth accumulation, business continuation planning and income tax planning.

The fee for comprehensive financial plans ranges from \$1,000 to \$25,000. The fee covers all client meetings pertaining to the analysis, including data gathering, presenting the analysis, and any meetings, if requested by the client, to interpret the analysis for 12 months following the date of the analysis. For financial plans only, half of the agreed-upon fee is due at the time the contract is signed with the remaining portion of the fee billed 6 months within six months of the contracted work being completed. For financial plans with investment supervisory services, clients pay one-fourth of the agreed-upon annual fee quarterly. The fee for one quarter is due when the contract is signed. Clients pay Advantage Investment Management directly for these services.

Other Services

For furnishing advice to clients not involving securities, Advantage Investment Management bills clients at an hourly rate of \$400 for work prepared and/or supervised by a Certified Financial Planner. Clients pay Advantage Investment Management directly for these services. Clients are billed in arrears.

Additional Information on General Fees and Services

At Advantage Investment Management, we always put the client first. Each client completes a risk tolerance questionnaire and is asked about their time horizon, investment objective and investment experience. Only after reviewing this information, along with information gathered through meetings with the client, are investment recommendations chosen and presented to the client. Advisors with Advantage Investment Management fully disclose their compensation to clients.

Clients may pay other types of fees in addition to advisory fees. Our custodians, including Charles Schwab & Co., Lincoln Financial Group, Jackson National Life Insurance Co., Nationwide Mutual Insurance Company, Capital Group Companies, Inc. (American Funds), Principal Financial Group and Prudential Financial, Inc., may charge clients for trading fees, for incidental fees assessed by FINRA when trades occur and for statements delivered via US Mail. Mutual fund companies may charge portfolio management fees and 12b-1 fees. Clients invested in advisory annuities may also incur mortality and expense fees, subaccount management fees and fees associated with riders. However, the advisor will not receive any portion of these fees.

Clients always have the option to purchase recommended investments through other broker-dealers, custodians or agents that are not affiliated with Advantage Investment Management. However, should a client choose to purchase an investment with a broker-dealer, custodian or agent other than Advantage Investment Management, Advantage Investment Management will not be able to execute that trade.

6. Performance-Based Fees and Side-by-Side Management – *This section contains information about fees determined by growth of client assets and if these fees are charged in conjunction with other types of fees.*

The questions in this section are not applicable to Advantage Investment Management, as the firm does not charge clients performance-based fees.

7. Types of Clients – *This section contains information on the types of clients Advantage Investment Management provides investment advice.*

Advantage Investment Management provides investment advice to individuals and companies; pension and profit-sharing plans; and trusts, estates or charitable organizations. Advantage Investment Management generally provides advisory services to clients who have \$100,000 in assets or more invested in advisory accounts.

8. Methods of Analysis, Investment Strategies and Risk of Loss – *This section contains information on the methods Advantage Investment Management uses to analyze potential investment recommendations our advisors give to clients and the risks involved in such investments.*

Advantage Investment Management advisors recommend the following types of securities: exchange-listed securities, securities traded over the counter, corporate debt securities, certificates of deposit, United States government securities, variable life insurance, variable annuities, mutual fund shares, and real estate investment trusts.

Advantage Investment Management uses three methods to analyze securities. We evaluate data of past economic performance alone and in comparison, to other companies and indices. We review the fundamentals of a company – financial statements, health, management, competitive advantage, competitors and markets. And we evaluate the direction of future investment price through a technical analysis. For this analysis, we consult financial newspapers and magazines; materials prepared by others; annual reports, prospectuses and filings with the SEC; company press releases; and other pertinent investment related information. Advantage Investment Management also reviews each potential investment to determine whether they are suitable as long-term purchases or short-term purchases.

All investment strategies may involve loss of principal and foregone opportunity costs. We also advise clients prior to investing that they should consider various types of risks including geographic, investment, credit, financial, and business risk.

Despite our best efforts to find investments which will increase in value, investing in securities involves risk of loss that clients should be prepared to bear. We advise clients of this risk and discuss risk as a fundamental component of realizing investment goals.

9. Disciplinary Information – *This section contains information on any legal or disciplinary action against Advantage Investment Management or its owners or managers in a criminal or civil court or before a regulatory body, domestic or foreign.*

The questions in this section are not applicable to Advantage Investment Management, its owners or managers.

10. Other Financial Industry Activities and Affiliations – *This section contains information on any other activities or affiliations that Advantage Investment Management advisors have in the financial services industry including types of business, names of entities affiliated with and whether conflicts of interest arise from these situations.*

Don Garton is an insurance agent licensed by the following states: Indiana and Kentucky. Billy Fowler is an insurance agent licensed by the following states: Indiana, Kentucky, and Virginia.

Lisa Heffley is an insurance agent licensed by Kentucky. No one in other states will be offered insurance products unless the advisor becomes registered in that state.

11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading – *This section contains information about Advantage Investment Management’s advisors and staff regarding financial interest in securities purchased by clients; purchasing securities for personal accounts; and how potential conflicts of interest are handled.*

Advantage Investment Management has a Code of Ethics which all employees are required to follow. This code describes the standards of conduct and fundamental responsibilities of the firm’s employees. More specifically, the code covers compliance with laws and regulations; protection of nonpublic information; personal securities trading; education and reporting violations and recordkeeping. A copy of the Code of Ethics is available upon request.

Advantage Investment Management investment advisor representatives and employees may purchase publicly traded securities for their own personal brokerage accounts and those of immediate family members. Investment advisor representatives and employees perform client trades prior to trading in their own accounts or those of family members.

12. Brokerage Practices – *This section contains information regarding receiving products or services in connection with client transactions; choosing a broker-dealer based upon receipt of client referrals; whether clients execute trades themselves; and potential conflicts of interest.*

Research and Other Soft Dollar Benefits

Advantage Investment Management receives access to third-party investment research tools for free from several custodians as do all advisors registered with these custodians.

Advantage Investment Management’s advisors receive sponsorships to attend educational conferences. We receive this benefit because of the revenue we generate for the sponsoring company and do not have to pay any or all of the cost of these trips.

All of our clients receive the benefits of the third-party investment research and the knowledge gained at the educational conferences.

This practice of the advisor receiving a benefit without paying for it can present a conflict of interest that gives advisors an incentive to recommend a custodian based on benefits received rather than on a client’s needs. At Advantage Investment Management, we are mindful of these conflicts and always strive to put the client first.

Brokerage for Client Referrals

Advantage Investment Management’s custodians do not refer their clients or prospective clients to our investment advisory practice.

Directed Brokerage

All client transactions processed by the firm in separate accounts are processed by Advantage Investment Management's institutional custodian: Charles Schwab & Co.

When Advantage Investment Management has multiple orders for the same security at the same time, the firm aggregates clients' orders on that security so that they can be bought at one time. When orders are aggregated, prices are averaged so that all clients placing that order pay the same price.

13. Review of Accounts – *This section contains information regarding the review of client accounts by Advantage Investment Management advisors and the nature of reports that clients receive.*

Advantage Investment Management reviews advisory accounts on an ongoing basis. The accounts are reviewed by Managing Partner, Don Garton, who is a Certified Financial Planner™ or another advisor or an employee of Advantage Investment Management. Financial plans are reviewed based on the terms of the agreement between the client and Advantage Investment Management.

Clients receive written reports of their investments at each meeting they have with an investment advisor representative of Advantage Investment Management. The data for these reports comes directly from the custodian, and the report analyzes the portfolio against various benchmarks and provides research on each holding in the portfolio. Advantage Investment Management determines the parameters for these reports but does not generate the data for the reports.

Clients with assets held in separate accounts at Charles Schwab & Co. will receive monthly statements. Clients with assets held at other qualified custodians will receive statements at least yearly, but usually quarterly or monthly.

Clients will be able to review information about many, if not all, of their assets through the internet at any time if they desire to have this option set up. This opportunity may not be available with all qualified custodians.

14. Client Referrals and Other Compensation – *This section contains information regarding receiving economic benefit for client referrals and any other compensation received by Advantage Investment Management.*

The questions in this section are not applicable to Advantage Investment Management.

15. Custody – *This section contains information regarding the entity that maintains custody of client assets.*

Advantage Investment Management does not maintain custody of any client funds.

16. Investment Discretion – *This section contains information regarding discretionary authority of client assets.*

Advantage Investment Management has been specifically authorized by some clients to maintain discretionary authority on their accounts. This allows the firm to make trades on behalf of a client account without consulting the client first. For non-discretionary accounts we do not determine the securities to be bought or sold or the amount of any securities to be bought or sold in any client's account. Non-discretionary clients alone have the authority to determine whether to act upon the recommendations given to them.

17. Voting Client Securities – *This section contains information regarding discretionary authority to vote client securities.*

Clients may designate their advisor to receive proxies and solicitations or receive those directly from their custodian or transfer agent. Advantage Investment Management acts on any authority to vote client securities solely at the request of the client who owns those securities. If a client has questions about a particular solicitation, they should contact Advantage Investment Management.

18. Financial Information – *This section contains information regarding prepayment of fees by clients and bankruptcy by the firm.*

Advantage Investment Management offers services on both a non-discretionary and discretionary basis. AIM does not have custody of clients' funds or securities. All clients' funds and securities are held at one of the custodians the firm works with. AIM does not require or solicit prepayment of more than \$1,200 in advisory fees, more than six months in advance of services rendered.

Advantage Investment Management does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

Advantage Investment Management has not been the subject of any bankruptcy petition.

19. Requirements for State-Registered Advisors – *This section contains information required for investment advisors registered with a state, including biographical information and business experience on all management personnel; other business activity engaged in by management personnel; on any legal or disciplinary action against management personnel in a criminal or civil court or before a regulatory body; or any other relationships with an issuer of securities.*

Advantage Investment Management is an SEC-registered Investment Advisor and is exempt from this requirement.



ADV Part 2B – This brochure supplement is required for each supervised person working at a firm which is a registered investment advisor.

1. Cover Page

Donald L. “Don” Garton

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This brochure supplement provides information about Don Garton that supplements the Advantage Investment Management brochure. You should have received a copy of that brochure. Please contact Managing Partner, Don Garton, if you did not receive a copy of Advantage Investment Management’s brochure or if you have any questions about the contents of this supplement.

Additional information about Don Garton is available on the SEC’s website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience – *This section contains biographical information and business experience on the supervised person.*

Don Garton, Managing Partner of Advantage Investment Management, has over 30 years of experience as a financial advisor. Mr. Garton began his financial services career with American Express Financial Advisors before joining Lincoln Financial Securities Corporation (formerly Jefferson Pilot) in 2004 as a registered representative and branch manager. Mr. Garton joined Securities Service Network, LLC as a registered representative and branch manager in 2012. He joined Benchmark Investments, LLC in 2020 as a registered representative when SSN was acquired. He has been a self-employed financial advisor since 1992.

He received a B.S.W. from the University of Missouri at Columbia and a Master of Divinity in Theology from the Louisville Presbyterian Theological Seminary.

Mr. Garton has been a Certified Financial Planner™ since 1997, a Chartered Retirement Planning Counselor™ since 2011, a Chartered Financial Consultant® since 2012 and a Chartered Retirement Plans SpecialistSM since 2014.

CFP®

Certified Financial Planner™ is a professional certification 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 95,000 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, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

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

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

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

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

CRPC®

Chartered Retirement Planning Counselor™ is a professional certification granted in the United States by the College for Financial Planning. The CRPC® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CRPC® certification.

The CRPC® designation demonstrates that an advisor has expanded their knowledge of pre-retirement and post-retirement planning. The study program to become a CRPC® covers the entire retirement planning process, including meeting multiple financial objectives, sources of retirement income, personal savings, employer-sponsored retirement plans, income taxes, retirement cash flow, asset management, and estate planning.

To receive the CRPC® designation, an individual must successfully complete a course of study in the CRPC® program and pass an end of course exam. Individuals who receive the CRPC® designation and wish to continue to use the designation need to complete 16 hours of continuing education every two years.

ChFC®

Chartered Financial Consultant® is a professional certification granted in the United States by The American College for Financial Services. The ChFC® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold ChFC® certification. Currently, more than 48,000 individuals have been awarded ChFC® certification.

The ChFC® designation is financial planning’s highest standard of knowledge and trust. The ChFC® designation allows an advisor to meet the advanced financial planning needs of individuals, professionals, and small business owners. The information covered during this

course consists of in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning.

To receive the ChFC® designation, an individual must satisfactorily fulfill the following requirements:

- Education – Successfully complete required courses and electives in the ChFC® program.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).
- Code of Ethics – Agree to be bound by the Code of Ethics which includes the Professional Pledge and eight Canons.
 - Professional Pledge
"In all my professional relationships, I pledge myself to the following rule of ethical conduct: I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself."
 - The Canons
 - Conduct yourself at all times with honor and dignity.
 - Avoid practices that would bring dishonor upon your profession or The American College.
 - Publicize your achievements in ways that enhance the integrity of your profession.
 - Continue your studies throughout your working life so as to maintain a high level of professional competence.
 - Do your utmost to attain a distinguished record of professional service.
 - Support the established institutions and organizations concerned with the integrity of your profession.
 - Participate in building your profession by encouraging and providing appropriate assistance to qualified persons pursuing professional studies.
 - Comply with all laws and regulations, particularly as they relate to professional and business activities.

Individuals who receive the ChFC® designation and wish to continue to use the designation need to complete 30 hours continuing education of every two years to maintain competence and keep up with developments in the financial planning field.

CRPS®

Chartered Retirement Plans SpecialistSM is a professional certification granted in the United States by the College for Financial Planning. The CRPS® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CRPS® certification.

The CRPS® designation demonstrates that an advisor has expanded their knowledge of design, installation, maintenance, and administration of retirement plans. The study program to become a CRPS® covers the types and characteristics of retirement plans, including IRAs, small business retirement plans, defined contribution plans, 401(k) plans and nonprofit and government plans. It

also covers plan distributions, plan design and implementation, plan establishment and operation, and fiduciary issues.

To receive the CRPS® designation, an individual must successfully complete a course the study in the CRPS® program and pass an end of course exam. Individuals who receive the CRPS® designation and wish to continue to use the designation need to complete 16 hours of continuing education every two years.

3. Disciplinary Action - *This section contains information on any legal or disciplinary action against the supervised person in a criminal or civil court or before a regulatory body, domestic or foreign.*

The questions in this section are not applicable to Don Garton.

4. Other Business Activities – *This section contains information regarding affiliations with financial industry organizations; how potential conflicts of interest are handled; and other business activity the supervised person is engaged in.*

Don Garton is a life insurance and health insurance agent licensed by the following states: Indiana and Kentucky. No one in other states will be offered insurance products unless the advisor becomes registered in that state.

In addition to providing investment advice, Don is involved in several outside business activities. He owns multiple residential rental and commercial rental properties, on which he works an average of 10 hours a week during nights and weekends. Don volunteers his time with not-for-profit boards of the Mid-Kentucky Presbytery and Highland Presbyterian Church, which combined averages approximately 5 hours a week during nights and weekends.

5. Additional Compensation – *This section contains information regarding receiving products or services in connection with client transactions and how potential conflicts of interest are handled.*

Don Garton does not receive economic benefit for his work other than compensation earned through contractual agreement.

6. Supervision – *This section contains information regarding how the supervised person is supervised by the firm.*

Don Garton supervises himself.

7. Requirements for State-Registered Advisors – *This section contains information of whether the supervised person has ever been found liable through arbitration or in a civil court or before a regulatory body; or if the supervised person has been the subject of a bankruptcy petition.*

The questions in this section are not applicable to Don Garton.



ADV Part 2B – *This brochure supplement is required for each supervised person working at a firm which is a registered investment advisor.*

1. Cover Page

William T. “Billy” Fowler IV

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March 26, 2024

This brochure supplement provides information about Billy Fowler that supplements the Advantage Investment Management brochure. You should have received a copy of that brochure. Please contact Managing Partner, Don Garton, if you did not receive a copy of Advantage Investment Management’s brochure or if you have any questions about the contents of this supplement.

Additional information about Billy Fowler is available on the SEC’s website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience – *This section contains biographical information and business experience on the supervised person.*

Billy Fowler, Investment Advisor Representative at Advantage Investment Management, has over 25 years of experience in the financial services and insurance industry. Billy graduated from Centre College with a BS in Government and Economics in 1997. He has been working in some aspect of the industry since graduation, getting his start at Morgan Stanley Dean Witter. In 2003, Billy started The Benefits Firm, an employee benefits and insurance firm. In 2020, Billy joined Advantage Investment Management.

3. Disciplinary Action - *This section contains information on any legal or disciplinary action against the supervised person in a criminal or civil court or before a regulatory body, domestic or foreign.*

The questions in this section are not applicable to Billy Fowler

4. Other Business Activities – *This section contains information regarding affiliations with financial industry organizations; how potential conflicts of interest are handled; and other business activity the supervised person is engaged in.*

Billy Fowler holds life and health insurance licenses Indiana, Kentucky, and Virginia, and writes insurance contracts outside of Advantage Investment Management. Billy owns and manages The Benefits Firm, a complete insurance agency specializing in employee benefits and group insurance for businesses.

Billy Fowler and his wife own MedSavRX, a prescription drug discount card service for use at Kroger pharmacies in Kentucky and Tennessee. They receive compensation from Kroger for this service.

Billy Fowler is part owner of Benefit Administrative Solutions, a third-party administrator that administers benefit programs at The Benefits Firm.

Billy Fowler is active in the community and participates in several civic organizations. Formerly, Billy served as the president of the Saint Matthews Chamber of Commerce. He is a strong advocate for children's charities, specifically Kosair Charities, West End School, and the YMCA.

5. Additional Compensation – *This section contains information regarding receiving products or services in connection with client transactions and how potential conflicts of interest are handled.*

Billy Fowler receives commissions through the sale of insurance products through The Benefits Firm.

Billy Fowler does not receive economic benefit for his work other than compensation earned through contractual agreement.

6. Supervision – *This section contains information regarding how the supervised person is supervised by the firm.*

Don Garton is responsible for supervising Billy Fowler in his activities as an Investment Advisor Representative. Don reviews Billy's activities on a regular and ongoing basis. Recommendations to clients outside normal policies and procedures are reviewed prior to Billy discussing them with clients.

7. Requirements for State-Registered Advisors – *This section contains information of whether the supervised person has ever been found liable through arbitration or in a civil court or before a regulatory body; or if the supervised person has been the subject of a bankruptcy petition.*

The questions in this section are not applicable to Billy Fowler



ADV Part 2B – This brochure supplement is required for each supervised person working at a firm which is a registered investment advisor.

1. Cover Page

Michael J. Garton

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www.aim-rps.com

March 26, 2024

This brochure supplement provides information about Michael Garton that supplements the Advantage Investment Management brochure. You should have received a copy of that brochure. Please contact Managing Partner, Don Garton, if you did not receive a copy of Advantage Investment Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Michael Garton is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience – *This section contains biographical information and business experience on the supervised person.*

Michael Garton is an Investment Advisor Representative at Advantage Investment Management. Growing up in Louisville, Michael graduated from the Math, Science, and Technology Magnet program at duPont Manual High School and from Centre College/Columbia University with a BA in Government and Architecture. Following a decade of working in publishing, consulting, and government relations, he joined the firm after moving back home from Chicago.

Michael Garton joined Advantage Investment Management full-time in March 2019 but has been a technology consultant for the firm since 2005.

3. Disciplinary Action - *This section contains information on any legal or disciplinary action against the supervised person in a criminal or civil court or before a regulatory body, domestic or foreign.*

The questions in this section are not applicable to Michael Garton.

4. Other Business Activities – *This section contains information regarding affiliations with financial industry organizations; how potential conflicts of interest are handled; and other business activity the supervised person is engaged in.*

Michael Garton serves as a part-time Legislative Aide for the Louisville Metro Council.

5. Additional Compensation – *This section contains information regarding receiving products or services in connection with client transactions and how potential conflicts of interest are handled.*

Michael Garton does not receive economic benefit for his work other than compensation earned through contractual agreement.

6. Supervision – *This section contains information regarding how the supervised person is supervised by the firm.*

Don Garton is responsible for supervising Michael Garton in his activities as an Investment Advisor Representative. Don Garton reviews Michael's activities on a regular and ongoing basis. Recommendations to clients outside normal policies and procedures are reviewed prior to Michael discussing them with clients.

7. Requirements for State-Registered Advisors – *This section contains information of whether the supervised person has ever been found liable through arbitration or in a civil court or before a regulatory body; or if the supervised person has been the subject of a bankruptcy petition.*

The questions in this section are not applicable to Michael Garton.



ADV Part 2B – This brochure supplement is required for each supervised person working at a firm which is a registered investment advisor.

1. Cover Page

Lisa C. Heffley

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This brochure supplement provides information about Lisa Heffley that supplements the Advantage Investment Management brochure. You should have received a copy of that brochure. Please contact Managing Partner, Don Garton, if you did not receive a copy of Advantage Investment Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Lisa Heffley is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience – *This section contains biographical information and business experience on the supervised person.*

Lisa Heffley is an Investment Advisor Representative at Advantage Investment Management with over 35 years of experience in the financial services industry. Lisa has held business analyst and management positions at Raymond James Financial, Provident Corporation, The Guardian, and Western & Southern Financial Group. These roles included various positions in sales, support and marketing, research, administration and operations, and competitive intelligence. Prior to joining the firm, Lisa was an independent consultant for various insurance and annuity providers. Lisa joined Advantage Investment Management as an Investment Advisor Representative in 2022.

Lisa Heffley received her B.S. in Business Administration and Psychology from The University of Pittsburgh. She has held her Series 7 since 1989 and is a Chartered Financial Consultant® since 1995.

ChFC®

Chartered Financial Consultant® is a professional certification granted in the United States by The American College for Financial Services. The ChFC® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold ChFC® certification. Currently, more than 48,000 individuals have been awarded ChFC® certification.

The ChFC® designation is financial planning's highest standard of knowledge and trust. The ChFC® designation allows an advisor to meet the advanced financial planning needs of individuals, professionals and small business owners. The information covered during this course consists of in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning.

To receive the ChFC® designation, an individual must satisfactorily fulfill the following requirements:

- Education – Successfully complete required courses and electives in the ChFC® program.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).
- Code of Ethics – Agree to be bound by the Code of Ethics which includes the Professional Pledge and eight Canons.
 - Professional Pledge
"In all my professional relationships, I pledge myself to the following rule of ethical conduct: I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself."
 - The Canons
 - Conduct yourself at all times with honor and dignity.
 - Avoid practices that would bring dishonor upon your profession or The American College.
 - Publicize your achievements in ways that enhance the integrity of your profession.

- Continue your studies throughout your working life so as to maintain a high level of professional competence.
- Do your utmost to attain a distinguished record of professional service.
- Support the established institutions and organizations concerned with the integrity of your profession.
- Participate in building your profession by encouraging and providing appropriate assistance to qualified persons pursuing professional studies.
- Comply with all laws and regulations, particularly as they relate to professional and business activities.

Individuals who receive the ChFC® designation and wish to continue to use the designation need to complete 30 hours continuing education of every two years to maintain competence and keep up with developments in the financial planning field.

3. Disciplinary Action - *This section contains information on any legal or disciplinary action against the supervised person in a criminal or civil court or before a regulatory body, domestic or foreign.*

The questions in this section are not applicable to Lisa Heffley.

4. Other Business Activities – *This section contains information regarding affiliations with financial industry organizations; how potential conflicts of interest are handled; and other business activity the supervised person is engaged in.*

Lisa Heffley is an insurance agent licensed by Kentucky. No one in other states will be offered insurance products unless the advisor becomes registered by that state.

In addition to providing investment advice, Lisa Heffley volunteers her time with not-for-profit boards and committees of The Temple. She is also involved with Kentucky Tennis and volunteers at tournaments and USTA leagues as a captain.

5. Additional Compensation – *This section contains information regarding receiving products or services in connection with client transactions and how potential conflicts of interest are handled.*

Lisa Heffley does not receive economic benefit for her work other than compensation earned through contractual agreement.

6. Supervision – *This section contains information regarding how the supervised person is supervised by the firm.*

Don Garton is responsible for supervising Lisa Heffley in her activities as an Investment Advisor Representative. Don reviews Lisa's activities on a regular and ongoing basis. Recommendations

to clients outside normal policies and procedures are reviewed prior to Lisa discussing them with clients.

7. Requirements for State-Registered Advisors – *This section contains information of whether the supervised person has ever been found liable through arbitration or in a civil court or before a regulatory body; or if the supervised person has been the subject of a bankruptcy petition.*

The questions in this section are not applicable to Lisa Heffley.