

# **Stephen J. Garry & Associates, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 19, 2024**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Stephen J. Garry & Associates, LLC (“Stephen J. Garry & Associates” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (516) 280-5588.

Stephen J. Garry & Associates 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 Stephen J. Garry & Associates to assist you in determining whether to retain the Advisor.

Additional information about Stephen J. Garry & Associates and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 295068.

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## Item 2 – Material Changes

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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 Stephen J. Garry & Associates. For convenience, the Advisor has combined these documents into a single disclosure document.

Stephen J. Garry & Associates 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. Stephen J. Garry & Associates encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our 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](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 295068. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (516) 280-5588.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Stephen J. Garry & Associates, LLC (“Stephen J. Garry & Associates” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. Stephen J. Garry & Associates was founded in April 2018 and is owned and operated by Stephen J. Garry (Chief Investment Officer, President & Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Stephen J. Garry & Associates.

### **B. Advisory Services Offered**

Stephen J. Garry & Associates offers investment advisory services to individuals, high net worth individuals, trusts, estates, corporations, and pension and profit-sharing 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. Stephen J. Garry & Associates’ 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.

#### Investment Management Services

Stephen J. Garry & Associates provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Stephen J. Garry & Associates works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Stephen J. Garry & Associates will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds or options contracts to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Stephen J. Garry & Associates’ investment approach is 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. Stephen J. Garry & Associates 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.

Stephen J. Garry & Associates evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Stephen J. Garry & Associates may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Stephen J. Garry & Associates 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. Stephen J. Garry & Associates 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 deemed to be in the Client’s best interest, the Advisor will recommend that a Client take a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts (“IRAs”), 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). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 (“ERISA”) and/or the Internal Revenue Code (“IRC”), as

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applicable, which are laws governing retirement accounts. 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.

At no time will Stephen J. Garry & Associates accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement, please see Item 12 – Brokerage Practices.

#### Financial Planning Services

Stephen J. Garry & Associates will typically provide a variety of financial planning and consulting services to Clients as a component of investment management services. 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.

Stephen J. Garry & Associates may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations poses 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 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.

#### **C. Client Account Management**

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

## D. Wrap Fee Programs

Stephen J. Garry & Associates includes securities transaction fees for certain securities that charge a transaction fee, custodial, ACAT and administrative fees, including wire fees and other fees and expenses (herein "Covered Costs"), together with its investment advisory fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program." The Advisor customizes its investment management services for its Clients. The Advisor sponsors the Stephen J. Garry & Associates Wrap Fee Program Brochure solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

## E. Assets Under Management

As of December 31, 2023, Stephen J. Garry & Associates manages approximately \$110,207,796 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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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 a written agreement with the Advisor.

### A. Fees for Advisory Services

#### Investment Management Services

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

Assets Under Management (\$)	Annual Rate (%)
Under to \$500,000	1.50%
\$500,001 to \$1,500,000	1.25%
Over to \$1,500,000	1.00%

The investment advisory 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 Stephen J. Garry & Associates will be independently valued by the Custodian. Stephen J. Garry & Associates will conduct periodic reviews of the Custodian's valuations.

### B. Fee Billing

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. Certain Clients may have their fees directly invoiced to the Client. 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 Stephen J. Garry & Associates at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Stephen

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J. Garry & Associates directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Stephen J. Garry & Associates includes Covered Costs as part of its overall investment advisory fee through the Stephen J. Garry & Associates Wrap Fee Program Brochure. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to Stephen J. Garry & Associates for investment advisory services or part of the Stephen J. Garry & Associates Wrap Fee Program Brochure 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 Stephen J. Garry & Associates, but would not receive the services provided by Stephen J. Garry & Associates 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 Stephen J. Garry & Associates 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**

Stephen J. Garry & Associates is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement 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. 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.

### **E. Compensation for Sales of Securities**

Stephen J. Garry & Associates does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Stephen J. Garry is also registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In Mr. Garry's separate capacity as a registered representative of PKS, Mr. Garry may implement securities transactions under PKS and not through Stephen J. Garry & Associates. In such instances, Mr. Garry 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 Mr. Garry in his capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because Mr. Garry has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor or Mr. Garry. Neither the Advisor nor Mr. Garry will earn ongoing investment advisory fees in connection with any products or services implemented in the Mr. Garry's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Stephen J. Garry is also licensed as an independent insurance professional. As an independent insurance professional, Mr. Garry may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because the person providing investment

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advice on behalf of the Advisor is also an insurance agent and may have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Garry. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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

Stephen J. Garry & Associates 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.

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## **Item 7 – Types of Clients**

Stephen J. Garry & Associates offers investment advisory services to individuals, high net worth individuals, corporation, and pension and profit-sharing plans. The amount of each type of Client is available on Stephen J. Garry & Associates' Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Stephen J. Garry & Associates generally does not impose a minimum relationship size.

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

### **A. Methods of Analysis**

Stephen J. Garry & Associates employs a fundamental analysis method in developing investment strategies for its Clients. A technical, cyclical, charting method of analysis may also be utilized when deemed necessary to achieve a client's investment objective. Research and analysis from Stephen J. Garry & Associates 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. These criteria are generally 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, Stephen J. Garry & Associates generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Stephen J. Garry & Associates 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, Stephen J. Garry & Associates 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. Stephen J. Garry & Associates 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.

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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 approach:

#### 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 ETFs

Bond ETFs 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 are 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.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by

changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-

**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**

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**There are no legal, regulatory or disciplinary events involving Stephen J. Garry & Associates or any of its Supervised Persons.** Stephen J. Garry & Associates 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 and its Supervised People are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 295068.

## **Item 10 – Other Financial Industry Activities and Affiliations**

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### Broker-Dealer Affiliation

As noted in Item 5, Mr. Garry is also a registered representative of PKS. In his separate capacity as a registered representative, Mr. Garry will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Garry. Neither the Advisor nor Mr. Garry will earn ongoing investment advisory fees in connection with any services implemented in Mr. Garry's separate capacity as a registered representative.

### Insurance Agency Affiliations

As noted in Item 5, Mr. Garry is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with the Advisor. As an insurance professional, Mr. Garry will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Garry 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. Garry or the Advisor.

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

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### **A. Code of Ethics**

Stephen J. Garry & Associates 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 Stephen J. Garry & Associates ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to the Client. Stephen J. Garry & Associates and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Stephen J. Garry & Associates' 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 (516) 280-5588.

### **B. Personal Trading with Material Interest**

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

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### C. Personal Trading in Same Securities as Clients

Stephen J. Garry & Associates 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 have 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 Stephen J. Garry & Associates 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 Stephen J. Garry & Associates 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 afterward. **At no time will Stephen J. Garry & Associates, or any Supervised Person of Stephen J. Garry & Associates, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

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

Where Stephen J. Garry & Associates does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] 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 Stephen J. Garry & Associates. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Stephen J. Garry & Associates 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.

Stephen J. Garry & Associates will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian." Stephen J. Garry & Associates maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

The 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. **Stephen J. Garry & Associates does not participate in soft dollar programs sponsored or offered by any broker-dealer. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Stephen J. Garry & Associates does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where Stephen J. Garry & Associates 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]). Stephen J. Garry & Associates 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. Stephen J. Garry & Associates will execute its transactions through the Custodian as authorized by the Client.

The Advisor may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. 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 particular Client accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Stephen J. Garry, President & Chief Compliance Officer of Stephen J. Garry & Associates. Formal reviews are generally conducted at least annually or more or less 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 Stephen J. Garry & Associates 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**

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#### **A. Compensation Received by Stephen J. Garry & Associates**

##### Participation in Institutional Advisor Platform

Stephen J. Garry & Associates has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Stephen J. Garry & Associates. As a registered investment advisor participating on the Schwab Advisor Services platform, Stephen J. Garry & Associates receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit

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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 economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and financial support to Stephen J. Garry & Associates that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Stephen J. Garry & Associates believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

## **B. Compensation for Client Referrals**

Stephen J. Garry & Associates does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

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Stephen J. Garry & Associates does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees and certain money movement authority as described below. 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 Stephen J. Garry & Associates 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 Stephen J. Garry & Associates 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**

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Stephen J. Garry & Associates typically 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 Stephen J. Garry & Associates. 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 agreement containing all applicable limitations to such authority. All discretionary trades made by Stephen J. Garry & Associates will be in accordance with each Client's investment objectives and goals.

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## **Item 17 – Voting Client Securities**

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Stephen J. Garry & Associates 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**

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Neither Stephen J. Garry & Associates, nor its management, have any adverse financial situations that would reasonably impair the ability of Stephen J. Garry & Associates to meet all obligations to its Clients. Neither Stephen J. Garry & Associates, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Stephen J. Garry & Associates 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 advance.



# **Stephen J. Garry & Associates, LLC**

## **Form ADV Part 2A – Appendix 1 ("Wrap Fee Program Brochure")**

**Effective: March 19, 2024**

This Form ADV2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for Stephen J. Garry & Associates, LLC ("Stephen J. Garry & Associates" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the Stephen J. Garry & Associates Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete Stephen J. Garry & Associates Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the Stephen J. Garry & Associates Disclosure Brochure, please contact the Advisor at (516) 280-5588.

Stephen J. Garry & Associates is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program 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 Wrap Fee Program Brochure provides information about Stephen J. Garry & Associates to assist you in determining whether to retain the Advisor.

Additional information about Stephen J. Garry & Associates and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 295068.

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## **Item 2 – Material Changes**

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Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses wrap fee programs offering by the Advisor.

### Material Changes

There have been no material changes to this Wrap Fee Program Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, the Advisor may amend this Wrap Fee Program Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete Stephen J. Garry & Associates Disclosure Brochure) or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of Stephen J. Garry & Associates.

You may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or by CRD# 295068. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (516) 280-5588.

### **Item 3 – Table of Contents**

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## Item 4 – Services Fees and Compensation

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### A. Services

Stephen J. Garry & Associates provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the Stephen J. Garry & Associates Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Stephen J. Garry & Associates as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, Stephen J. Garry & Associates includes normal securities transaction fees for certain securities that charge a transaction fee, custodial, ACAT and administrative fees, including wire fees and other fees and expenses (herein “Covered Costs”) as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program.” The Advisor sponsors the Stephen J. Garry & Associates Wrap Fee Program Brochure.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the Stephen J. Garry & Associates Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. The Advisor reviews Client accounts periodically to evaluate the level of trading and the underlying investments, and to validate that the wrap fee program remains in the Client’s best interest.

**Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

### B. Program Costs

Advisory services provided by Stephen J. Garry & Associates are offered in a wrap fee structure whereby normal securities transaction costs are included in the overall investment advisory fee paid to Stephen J. Garry & Associates. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program Brochure varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee structure has a potential conflict of interest as the Advisor may have an incentive to limit the number of trades placed in the Client’s account[s]. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

### C. Fees

Investment advisory fees are paid quarterly in advance pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Under to \$500,000	1.50%
\$500,001 to \$1,500,000	1.25%
Over to \$1,500,000	1.00%

The investment advisory 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 Advisor. All securities held in accounts managed by Stephen J. Garry & Associates will be independently valued by the Custodian. Stephen J. Garry & Associates will not have the authority or responsibility to value portfolio securities.

As noted above, the Wrap Fee Program Brochure includes Covered Costs incurred in connection with the investment management services provided by Stephen J. Garry & Associates. Securities transaction fees for Client-directed trades may be charged back to the Client.

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Clients will incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s] which are not included as part of the Wrap Fee Program. All fees paid to Stephen J. Garry & Associates for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds ("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. The Client may also incur other costs assessed by the Custodian or other parties for account related activity fees. Clients are encouraged to refer to the account opening paperwork executed with the Custodian for an outline of all third-party fees not covered under this Wrap Fee Program.

The Advisor does not control nor share in any of these third-party fees. Clients are encouraged to review all fees charged by the fund[s], third parties and Stephen J. Garry & Associates to fully understand the total fees to be paid. **Please see Item 5.C. – Other Fees and Expenses of the Disclosure Brochure.**

#### **D. Compensation**

Stephen J. Garry & Associates is the sponsor and portfolio manager of this Wrap Fee Program Brochure. Stephen J. Garry & Associates receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the normal trading activity in the Client's account[s].

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

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Stephen J. Garry & Associates offers investment advisory services to individuals, high net worth individuals, trusts, estates, pension and profit-sharing plans. Stephen J. Garry & Associates generally does not impose a minimum account size for establishing a relationship. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

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

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#### **Portfolio Manager Selection**

Stephen J. Garry & Associates serves as sponsor and as portfolio manager for the services under this Wrap Fee Program Brochure.

#### **Related Persons**

Stephen J. Garry & Associates personnel serve as portfolio managers for this Wrap Fee Program Brochure. Stephen J. Garry & Associates does not serve as a portfolio manager for any third-party wrap fee programs.

#### **Performance-Based Fees**

Stephen J. Garry & Associates does not charge performance-based fees.

#### **Supervised Persons**

Stephen J. Garry & Associates Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

#### **Methods of Analysis**

Please see Item 8 of the Disclosure Brochure for details on the research and analysis methods employed by the Advisor.

#### **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. Stephen J. Garry & Associates will assist Clients in

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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.

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[s]. 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.

**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. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

#### **Proxy Voting**

Stephen J. Garry & Associates 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 7 – Client Information Provided to Portfolio Managers**

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Stephen J. Garry & Associates is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the Stephen J. Garry & Associates Privacy Policy (included after this Wrap Fee Program Brochure).

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

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Stephen J. Garry & Associates is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Stephen J. Garry & Associates.

#### **Item 9 – Additional Information**

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##### **A. Disciplinary Information and Other Financial Industry Activities and Affiliations**

Stephen J. Garry & Associates values the trust you place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider with whom you partner. The backgrounds of the Advisor and its Supervised Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 295068. Please see Item 9 – Disciplinary Information of the Disclosure Brochure as well as Item 3 – Disciplinary Information of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

##### Other Financial Activities and Affiliations

Please see Items 10 – Other Financial Industry Activities and Affiliations and Item 14 – Other Compensation and Client Referrals of the Disclosure Brochure.

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

Stephen J. Garry & Associates has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Stephen J. Garry & Associates' compliance program ("Supervised Persons"). Complete details on the Stephen J. Garry & Associates Code of

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Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading of the Disclosure Brochure.

#### Review of Accounts

Investments in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Stephen J. Garry & Associates under the supervision of the Chief Compliance Officer (“CCO”). Details of the review policies and practices are provided in Item 13 – Review of Accounts of the Disclosure Brochure.

#### Other Compensation

*Participation in Institutional Advisor Platform* - Stephen J. Garry & Associates has established an institutional relationship with Schwab (“Custodian”) to assist the Advisor in managing Client account[s]. Access to the Schwab platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. The software and related systems support may benefit the Advisor, but not its Clients directly. 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 economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Please see Item 14 – Other Compensation of the Disclosure Brochure for details on additional compensation that may be received by Stephen J. Garry & Associates or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

#### Compensation for Client Referrals

Stephen J. Garry & Associates does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

#### Financial Information

Neither Stephen J. Garry & Associates, nor its management have any adverse financial situations that would reasonably impair the ability of Stephen J. Garry & Associates to meet all obligations to its Clients. Neither Stephen J. Garry & Associates, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Stephen J. Garry & Associates is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 – Financial Information of the Disclosure Brochure.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Stephen J. Garry, CFP®, ChFC®**  
**Chief Investment Officer & President**

**Effective: March 19, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Stephen J. Garry, CFP®, ChFC® (CRD No: 2071478) in addition to the information contained in the Stephen J. Garry & Associates, LLC (“Stephen J. Garry & Associates” or the “Advisor”, CRD No: 295068) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Stephen J. Garry & Associates Disclosure Brochure or this Brochure Supplement, please contact us at (516) 280-5588.

Additional information about Mr. Garry is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD No: 2071478.

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## Item 2 – Educational Background and Business Experience

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Stephen J. Garry, CFP®, ChFC® born in 1965, is dedicated to advising Clients of Stephen J. Garry & Associates as the Chief Investment Officer, President and Chief Compliance Officer. Mr. Garry earned a Bachelors of Arts in Finance from Hofstra University in 1988. Additional information regarding Mr. Garry's employment history is included below.

### Employment History:

Chief Investment Officer, President & Chief Compliance Officer, Stephen J. Garry & Associates, LLC	03/2018 to Present
Registered Representative, Purshe Kaplan Sterling Investments	07/2018 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	10/1990 to 07/2018

### 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 71,000 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 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.

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Stephen J. Garry & Associates, LLC  
990 Stewart Ave, Suite 190, Garden City, NY 11530  
Phone: (516) 280-5588 \* Fax: (516) 280-5586  
<http://www.stephengarrywealthmgmt.com>

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

#### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Garry.*** Mr. Garry has never been involved in any regulatory, civil or criminal action. There have been no lawsuits, arbitration claims or administrative proceedings against Mr. Garry.

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. Garry.***

However, we do encourage you to independently view the background of Mr. Garry on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD No: 2071478.

### **Item 4 – Other Business Activities**

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#### Broker-Dealer Affiliation

Stephen J. Garry is also a registered representative of Purshe, Kaplan and Sterling ("PKS"). PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In Mr. Garry's separate capacity as a registered representative of PKS, Mr. Garry will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Garry. Neither the Advisor nor Mr. Garry will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Garry's separate capacity as a registered representative.

#### Insurance Agency Affiliations

Mr. Garry is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Garry's role with Stephen J. Garry & Associates. As an insurance professional, Mr. Garry will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Garry 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. Garry or the Advisor.

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## **Item 5 – Additional Compensation**

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

## **Item 6 – Supervision**

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Mr. Garry serves as the Chief Investment Officer, President and Chief Compliance Officer of Stephen J. Garry & Associates. Mr. Garry can be reached at (516) 280-5588.

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

**Connor M. Garry  
Investment Advisor Representative**

**Effective: March 19, 2024**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Connor M. Garry (CRD# 7658109) in addition to the information contained in the Stephen J. Garry & Associates, LLC ("Stephen J. Garry & Associates" or the "Advisor", CRD# 295068) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Stephen J. Garry & Associates Disclosure Brochure or this Brochure Supplement, please contact us at (516) 280-5588

Additional information about Mr. Garry is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7658109.

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## Item 2 – Educational Background and Business Experience

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Connor M. Garry, born in 2000, is dedicated to advising Clients of Stephen J. Garry & Associates as an Investment Advisor Representative. Mr. Garry earned a Bachelor of Business Administration, Finance from University of South Carolina in 2021. Additional information regarding Mr. Garry's employment history is included below.

### Employment History:

Representative, Purshe Kaplan Sterling Investments	12/2022 to Present
Investment Advisor Representative, Stephen J Garry & Associates, LLC	11/2022 to Present
Front Desk/New Member Acquisition, Crunch Amityville	03/2022 to 04/2022
Finance Internship (Remote), Real Chemistry	06/2021 to 08/2021
Full Time Student, University of South Carolina	07/2018 to 12/2021
Delivery Driver, Gino's of Tuscany	10/2017 to 06/2018

## Item 3 – Disciplinary Information

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

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. Garry.***

However, we do encourage you to independently view the background of Mr. Garry on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7658109.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Garry is also a registered representative of Purshe Kaplan Sterling Investments ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Garry's separate capacity as a registered representative, Mr. Garry will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Garry. Neither the Advisor nor Mr. Garry will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Garry's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Garry is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Garry's role with Stephen J. Garry & Associates. As an insurance professional, Mr. Garry will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Garry 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. Garry or the Advisor. Mr. Garry spends approximately 5 hours per month in this capacity.

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## **Item 5 – Additional Compensation**

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

## **Item 6 – Supervision**

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Mr. Garry serves as an Investment Advisor Representative of Stephen J. Garry & Associates and is supervised by Stephen Garry, the Chief Compliance Officer. Mr. Garry can be reached at (516) 280-5588.

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

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Effective: March 19, 2024

### Our Commitment to You

Stephen J. Garry & Associates, LLC ("Stephen J. Garry & Associates" 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. Stephen J. Garry & Associates (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.

Stephen J. Garry & Associates 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.

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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?
<b>Servicing our Clients</b> 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. Stephen J. Garry & Associates shares Client information with PKS. This sharing is due to the oversight PKS has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the PKS Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Stephen J. Garry & Associates 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 Stephen J. Garry & Associates or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> 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
<b>Information About Former Clients</b> Stephen J. Garry & Associates 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 (516) 280-5588.