

**FIRM BROCHURE
(Part 2A of Form ADV)**

March 28, 2024

CGI WEALTH ADVISORS, INC.

SWEDESFORD CORPORATE CENTER
601 SWEDESFORD ROAD
FRAZER, PA 19355
610 854-1420
www.cgiadvisors.com

Part 2A of Form ADV (the “Brochure”) provides information about the qualifications and business practices of CGI Wealth Advisors, Inc. If you have any questions about the contents of this Brochure, please contact us at (610) 854-1425 and/or aharken@cgiadvisors.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

CGI Wealth Advisors, Inc. is registered as an investment adviser with the U.S. Securities and Exchange Commission; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about CGI Wealth Advisors, Inc. is also available on the SEC’s website at www.adviserinfo.sec.gov.

Form ADV Part 2

ITEM:1. COVER PAGE

Please refer to previous page.

ITEM:2. MATERIAL CHANGES

This is the first edition of this Brochure, and no changes have yet been made.

Pursuant to SEC Rules, CGI Wealth Advisors will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of the Firm's fiscal year end, along with a copy of this Brochure or an offer to provide the Brochure. Additionally, as CGI Wealth Advisors experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover. For more information about the Firm, please contact the Firm at aharken@cgiadvisors.com.

Additional information about the Firm and its investment adviser representatives is available on the SEC's website at www.adviserinfo.sec.gov or please visit our web site at www.cgiadvisors.com.

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ITEM:4. ADVISORY BUSINESS

A. Description of Firm

CGI Wealth Advisors, Inc. (“CGI Wealth Advisors” or the “Firm”) is a southeastern Pennsylvania investment advisory firm founded in 2020. CGI Wealth Advisors is incorporated in the state of Pennsylvania and is currently registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. The Investment Advisers Act of 1940 references “advisers” instead of our preferred spelling of “advisors”. The Firm conducts business primarily in Pennsylvania, but can work with clients domiciled in other states.

V. Bradley Palmer, Vice President of CGI Wealth Advisors, owns approximately 84% of the Firm. The remaining approximately 16% is owned by Aaron J. Harken, the Firm’s President. Although the Firm was first organized in 2020, Mr. Palmer and Mr. Harken each have over 17 years of advisory experience with other registered investment advisory firms and over 50 years of combined experience in the financial services industry.

CGI Wealth Advisors has commenced a succession plan pursuant to which Mr. Palmer’s percentage of ownership of the Firm will be reduced over an established period of time and Mr. Harken, who has assumed the role of President formerly held by Mr. Palmer, will become the Firm’s majority owner. Specifically, a stock redemption program has been initiated whereby a small portion of the revenues earned by CGI Wealth Advisors each month will be used to buy back shares held by Mr. Palmer, with Mr. Palmer’s ownership ultimately being reduced to zero by the end of the established 10-year redemption period. This will have no material impact on the Firm’s business activities or clientele.

B. Types of Advisory Services Offered

CGI Wealth Advisors primarily provides investment advisory services to individuals and to businesses for accounts other than 401(k) or other profit sharing or pension plans. As discussed more fully below, CGI Wealth Advisors helps clients identify goals and establish accumulation plans to achieve these goals while pursuing reasonable investment results that are consistent with the client’s level of risk tolerance. Once goals are achieved, asset distribution plans are implemented to maintain client objectives while complying with rules and regulations that may apply.

During the planning phase, CGI Wealth Advisors helps the client establish goals such as for retirement, education, major expenses or purchases, and gifting or other legacy objectives. Once the future asset needs are established any future shortfalls are calculated and translated into a current funding requirement.

A risk tolerance strategy is then determined for each investment goal. Goals with shorter investment horizons will generally be more conservative than those with farther away horizons. The ability to withstand market volatility and the client’s access to other funds during unexpected financial emergencies will be considered along with other factors.

Current assets will be reviewed to determine their risk exposure and an asset allocation strategy that is appropriate for the client's risk tolerance will be established for current as well as future investments.

An implementation plan will be established that takes into consideration taxation, cost basis, unrealized capital gains, market conditions, and other factors. The complete implementation plan may be executed over an extended time period designed to serve the client's best interests.

In recommending the types of investment options used in each client's account, CGI Wealth Advisors relies heavily on the principles of "Modern Portfolio Theory" and "Asset Allocation Strategies". These principles emphasize the value of diversification through the allocation of investment portfolios amongst multiple types of basic stock, bond, and cash asset classes. The Firm has discretionary authority to make investment decisions on behalf of the client, but generally executes these decisions according to the strategy agreed to with the client. The Firm is not an investment manager to any mutual fund, ETF, or other investment vehicle.

In selecting which investment vehicles it uses, CGI Wealth Advisors looks at performance criteria that includes rate of return, risk, manager tenure, and other factors believed to be indicators of an investment's adherence to its original asset style and its ability to sustain acceptable rate of return performance.

The ongoing management of a client's account is a major portion of the services provided by CGI Wealth Advisors. This includes account rebalancing to maintain the desired asset allocation strategy; quarterly monitoring of investment performance and adherence to established criteria; managing taxable events; managing systematic withdrawals and Required Minimum Distributions; reaffirming funding adequacy and risk profile on an ongoing basis; and providing quarterly account statements.

CGI Wealth Advisors is always available to answer questions or provide direction during times of market uncertainty and is always willing to conduct due diligence on any investment alternative about which a client may have questions.

C. General Information About CGI Wealth Advisors' Advisory Services

1. Gathering Individual Client Information

Before any advice is provided to a client, the Firm will meet with the client to learn the specific needs, goals, limitations, desires, and concerns of the client. Once the client situation is understood, the Firm will make recommendations they believe are suitable for that particular client and their particular situation. The recommendations may be based on a variety of factors, including the investment risk tolerance level of the client, their objectives, the risk exposure and investment style of each investment vehicle, comparisons of available investment options, and the relative costs and expenses of each investment vehicle.

2. Advisory Agreements

Prior to engaging CGI Wealth Advisors to provide investment advisory services, the client will be required to enter into a written agreement with the Firm setting forth the specific services desired, the fees to be charged, and the terms and conditions under which it will render its services. CGI Wealth Advisors will provide a Brochure and one or more Brochure Supplements to each client or prospective client prior to or contemporaneously with the execution of a Client Service Agreement. The advisory relationship will continue until terminated by the client or CGI Wealth Advisors in accordance with the provisions of these agreements.

D. Wrap-Fee Programs

CGI Wealth Advisors does not provide portfolio management services to any wrap fee programs, as that term is defined in the instructions to Form ADV Part 2.

E. Discretionary and Nondiscretionary Assets Advised

The Firm began operations in late 2020, and as of December 31, 2023 had 114 client accounts with assets totaling approximately \$98,938,218. All of these accounts are managed by the Firm on a discretionary basis, although the Firm will advise non-discretionary accounts.

ITEM:5. FEES AND COMPENSATION

A. Advisory Fees

Prior to engaging CGI Wealth Advisors to provide advisory services, the client will be required to enter into a written agreement with the Firm setting forth the terms and conditions and the fees under which it will render its services. Fees may be subject to negotiation under certain circumstances as agreed on by the Firm and the client. The fees charged by CGI Wealth Advisors generally covers most, if not all, transaction fees required to manage a client's account(s). The following description of fees outlines the typical fee structure under which CGI Wealth Advisors renders its services. The actual schedule of fees, as it applies to a particular client, will be clearly outlined in the Client Service Agreement, or in an Addendum or Supplement to the Agreement.

1. One Time Fees

CGI Wealth Advisors may charge a one-time fee for certain services such as a Needs Analysis or Asset Allocation Strategy. This fees may be per investment funding objective or account and are usually waived should the client enter into an ongoing investment advisory relationship regarding the assets reviewed.

2. Ongoing Fees

CGI Wealth Advisors typically charges an investment advisory fee on a tiered approach based upon the size of all accounts owned by a given client, commonly called the

“household”. These fees are shown below and as stated previously, usually cover most if not all transaction fees.

HOUSEHOLD SIZE	FEE
First \$500,000	1%
\$500,001 to \$1,000,000	.75%
\$1,000,001 to \$2,000,000	.50%
Excess over \$2,000,000	.25%

3. Fees for Other Consulting Services or Plan Specific Fees

In some instances, a client may request a unique service(s) not listed in the normal fee agreement. In such a case, the Firm will specify in a supplement to the advisory agreement with the client the exact fees that may apply. Some of these fees may be based on a per account basis, a per investment option basis, an hourly consulting fee, or other specific fees for specific reports or services requested.

Minimum Fee — CGI Wealth Advisors has no minimum fee and welcomes start up investors and/or small takeover accounts where the Firm will identify investments that allow the client to receive a diversified asset allocation strategy with rebalancing at a reasonable cost.

B. Billing Method

Fees can be paid in several ways and.

1. Direct Billed to Client

In this case, a fixed fee will usually be submitted to the client for payment.

2. Billed to Client Accounts

Clients pay a percent of assets based the schedule in the prior section.

C. Other Fees and Expenses

Clients should be aware additional fees may imposed by other service providers. CGI Wealth Advisors can usually help identify these expenses. In addition, mutual funds, Exchange Traded Funds (ETFs), Collective Investment Trusts (CITs), Separate Accounts, and Separately Managed Accounts (SMAs) typically charge fees to their shareholders, which are described in their respective prospectus documents, and usually include a management fee, administrative, operations, and mortality fees, and certain distribution fees such as 12b(1) and Sub Transfer Agent fees. These fees generally comprise a fund’s “expense ratio,” are deducted at the fund level, and have a direct bearing on the fund’s performance (and the client’s net investment return). In some cases, through a process called revenue sharing, mutual funds may distribute some of the fees they collect in their expense ratio to service providers as an inducement to use their funds. CGI Wealth Advisors accepts no revenue sharing and when revenue sharing is

available, endeavors to have it returned to the client's account. The Firm's preference is to use funds that do not engage in revenue sharing. In other cases Separate Accounts and SMAs may charge additional fees above those charged by the investment vehicle(s) they are invested in.

In addition, some mutual funds offer different share classes of the same fund, and one share class can have a higher expense ratio than another. Front or back-end sales charges and/or redemption fees may exist in some share classes. CGI Wealth Advisors endeavors to recommend the lowest cost share class available to a plan and avoid funds with front or back-end sales charges or redemption fees. It is possible the cheapest share class may have a minimum account size.

All fees paid to CGI Wealth Advisors for its services are separate and distinct from the fees and expenses outlined above.

D. Termination of Services

CGI Wealth Advisors bills clients monthly in advance. Terminating clients receive a refund for unearned fees. Either the client or CGI Wealth Advisors may terminate the Firm's services without penalty at any time. The Firm determines the amount to be refunded to the client, if any, by subtracting its fees earned as of the time of termination from any amounts collected in advance as of the time of termination.

E. No Compensation For Sale of Securities

CGI Wealth Advisors does not accept compensation for the sale of securities or other investment products.

ITEM:6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

CGI Wealth Advisors does not charge performance-based fees (*i.e.*, fees calculated based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client).

ITEM:7. TYPES OF CLIENTS

CGI Wealth Advisors provides advisory services primarily to individuals and business accounts, other than 401(k) or other profit sharing and pension plans. There is no minimum account size and start-up investors are welcome.

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

A. Methods of Analysis

In formulating investment advice, CGI Wealth Advisors utilizes detailed data published by organizations such as Morningstar and research conducted by other industry subject matter experts.

B. Investment Strategies

The primary investment strategy used to implement any investment advice given is to offer a diversified portfolio of investment options for participants to use in matching their personal tolerance for risk to an asset allocation strategy with a similar exposure to risk.

C. Risk of Loss

Clients should be aware that investing in securities always involves some risk of loss, and no amount of analysis or forecast can eliminate all risk of loss, nor can the Firm or any other investment adviser ever guaranty that an investor will not suffer future losses.

Some of the risks factored into advice from CGI Wealth Advisors include, but are not limited, to the following:

1. Interest-Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
2. Market Risk: The price of a stock, bond, mutual fund or other security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
3. Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
4. Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
5. Political and Legislative Risks: Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States.
6. Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
7. Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

8. Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
9. Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

ITEM:9. DISCIPLINARY INFORMATION

Registered investment advisers such as CGI Wealth Advisors are required to disclose all material facts regarding any legal or disciplinary event that would be material to a client's or prospective client's evaluation of the Firm or the integrity of its management. Neither CGI Wealth Advisors, nor any of its personnel, has been subject to any such legal or disciplinary event, and thus has no information to disclose with respect to this Item.

ITEM:10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Neither CGI Wealth Advisors, nor any of its employees, is registered as a securities broker-dealer, a registered representative of a broker-dealer, a futures commission merchant, commodity pool operator or commodity trading advisor.

The Firm does not have any affiliation with any related person who is a broker-dealer, investment company, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, real estate broker or dealer, or an entity that creates or packages limited partnerships.

CGI Wealth Advisors does not receive compensation directly or indirectly from other advisers that creates a material conflict of interest, nor does it have other business relationships with advisers that would create a material conflict of interest.

CGI Wealth Advisors is, however, part of a group of related companies. CGI Wealth Advisors is under common control with The Conestoga Group, Inc. and CGI Plan Advisors, Inc. The Conestoga Group, Inc. acts as a service provider in the nature of a holding company relationship with both CGI Wealth Advisors and CGI Plan Advisors, and the three companies are considered to make up the Conestoga Group. The Conestoga Group, Inc. is not a registered investment advisory firm, but its employees engage in insurance brokerage activities. CGI Wealth Advisors is a registered investment advisory firm, and concentrates its business on serving individual clients, while CGI Plan Advisors concentrates its business on serving 401(k) and other profit sharing or pension plan clients. The principals and employees of the three companies overlap. V. Bradley Palmer has ownership interests in all three companies.

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

A. Code of Ethics Summary

The principals and staff of CGI Wealth Advisors have adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm owes a duty of loyalty, fairness and good faith towards its clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include: general ethical principles, receipt and giving of gifts, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code of Ethics to any client or prospective client upon request.

B. Participation or Interest in Client Transactions and Personal Trading

It is CGI Wealth Advisors' policy to remain conflict free in its offering of investment advice. This means CGI Wealth Advisors will not solicit clients to purchase investments in which CGI Wealth Advisors or its associated persons have any conflict of interest. Additionally, as part of CGI Wealth Advisors' fiduciary duty to clients, the Firm and its associated persons will endeavor at all times to put the interests of the clients first, and at all times are required to adhere to the Firm's Code of Ethics.

The Firm's principals and associated persons may have positions in securities that we also recommend to clients. CGI Wealth Advisors' recommendations to clients may differ from client to client, based on each client's unique circumstances. The Firm may also recommend the purchase of a security for one client while recommending the sale of that security for another. CGI Wealth Advisors aims to act for the benefit of clients and place clients' interests before its own.

C. Timing of Trade Orders

All trades for clients are subject to the trading policies of the custodian with whom they are contracted. At no time will CGI Wealth Advisors receive preferential service or treatment over that of a client.

ITEM:12. BROKERAGE PRACTICES

CGI Wealth Advisors primarily engages in providing discretionary investment services to clients. As such, the Firm does directly engage in making securities trades. The Firm does not select brokers, recommend brokers, negotiate commissions, or otherwise have discretionary brokerage authority because the client has established an account at Pershing, a broker-dealer that is unrelated to CGI Wealth, and has directed CGI Wealth to use that broker-dealer. The broker-dealer is not affiliated with CGI Wealth, and the broker-dealer does not supervise CGI Wealth, its agents, or activities, or its regulatory compliance.

ITEM:13. REVIEW OF ACCOUNTS

A. Review of Accounts and Reviewers

The Firm and its advisors review client accounts on a frequency agreed to in the Service Agreement, usually quarterly. Advisors have Accredited Investment Fiduciary (AIF®) or similar credentials. These reviews can include some or all of the following issues:

- Investment performance according to an Investment Policy Statement
- Fee analysis and review
- Share class expense analysis
- Matching of client risk tolerance to the investment exposure of investment vehicles
- Measurement of investment funding adequacy to achieve client goals

B. Review Triggers

The Firm may also conduct unscheduled reviews for certain situations such as:

- Changes in legislation
- Changes in Morningstar data or methodology
- Sale and mergers of funds or service providers
- Product changes

C. Regular Reports

CGI Wealth Advisors typically prepares and maintains copies of Investment Policy Monitoring reports on a quarterly basis.

ITEM:14. CLIENT REFERRALS AND OTHER COMPENSATION

The Firm does not presently pay referral fees to independent persons or firms (“Solicitors”) for introducing clients to us. It is also the Firm’s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

ITEM:15. CUSTODY

CGI Wealth Advisors does not have actual custody of any client assets at any time. To mitigate any potential conflicts of interests, all client assets are held in custody at Pershing LLC, a subsidiary of The Bank of New York Mellon, through a partnership with Shareholder Services

Group (SSG). SSG clears all securities transactions under a fully disclosed clearing agreement with Pershing. Clients will receive monthly statements from Pershing and quarterly reports from CGI Wealth Advisors. The custodian is not affiliated with CGI Wealth, and the custodian does not supervise CGI Wealth, its agents, or activities, or its regulatory compliance.

ITEM:16. INVESTMENT DISCRETION

Most advisory services rendered by CGI Wealth Advisors are done on a discretionary basis. Investment decisions to invest in different investments are ultimately made by the Firm but usually discussed in at least in strategic terms with the client as the basis for entering into the advisory relationship.

ITEM:17. VOTING CLIENT SECURITIES

CGI Wealth Advisors' policy and practice is to not vote proxies on behalf of its clients and therefore, the Firm shall have no obligation to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a client's account. Consequently, clients retain the responsibility for receiving and voting all proxies for securities offered in the client's account(s).

ITEM:18. FINANCIAL INFORMATION

The Firm does not believe it has any financial commitments that may impair its ability to meet contractual and/or fiduciary obligations to clients. The Firm has not been the subject of a bankruptcy proceeding.

PART 2B INFORMATION FOLLOWS

PART 2B INFORMATION

Part 2B of the SEC's Form ADV is designed to provide certain information on the individuals who provide investment management services to the clients of the Firm. As indicated above, CGI Wealth Advisors is controlled by Vance Bradley Palmer and Aaron John Harken. Brad and Aaron are the only executives of the Firm. Brad Palmer completed his undergraduate studies in Marketing at The Pennsylvania State University in 1976, and has over 40 years of experience in the financial services industry. He received the Accredited Investment Fiduciary (AIF®) designation in 2005 and the Accredited Investment Fiduciary Analyst (AIFA®) designation a few years later. Brad lives in Malvern with Sue, his wife of over 40 years. Brad and Sue have three adult children, the youngest of whom, Doug, is a Retirement Plan Advisor in CGI Plan Advisors, Inc., another Registered Investment Advisory firm owned by Brad and described below.

Aaron J. Harken graduated from Ursinus College with a Bachelor of Arts degree in History in 1996 and has over 24 years of experience in the financial services industry. He received the Accredited Investment Fiduciary (AIF®) designation in 2010 and a Master of Science in Financial Services (MSFS) degree in the same year from The Institute of Business and Finance. Aaron lives in Collegeville with his wife Brigitte and two boys.

For more than ten years prior to the formation of CGI Wealth Advisors, both Brad and Aaron were investment professionals (registered representatives and investment advisory representatives) with subsidiaries of Commonwealth Financial Network, an independent, nationwide securities brokerage firm and registered investment advisory firm based in Waltham, MA. Neither Brad, nor Aaron, nor any other person associated with CGI Wealth Advisors, has any disciplinary, administrative, civil, or criminal history to disclose.

Aaron is the President of CGI Wealth Advisors and the investment professional who is most often in direct contact with individual clients. Brad is Vice President and Chief Compliance Officer. CGI Wealth Advisors is under common control with The Conestoga Group, Inc. and CGI Plan Advisors, Inc. The Conestoga Group, Inc. acts as a service provider in the nature of a holding company relationship with both CGI Wealth Advisors and CGI Plan Advisors, and the three companies are considered to make up the Conestoga Group. The Conestoga Group, Inc. is not a registered investment advisory firm, but its employees engage in insurance brokerage activities. CGI Wealth Advisors is a registered investment advisory firm, and concentrates its business on serving individual clients, while CGI Plan Advisors concentrates its business on serving 401(k) and other profit sharing or pension plan clients. The principals and employees of the three companies overlap. V. Bradley Palmer has ownership interests in all three companies. Brad is the President of CGI Plan Advisors, with which Aaron is not associated. Both Brad and Aaron are licensed insurance agents through The Conestoga Group, Inc., and may receive insurance commission income for sales of insurance products through The Conestoga Group, including sales to clients of CGI Wealth Advisors and/or CGI Plan Advisors, Inc..