

Financial Gravity Wealth, Inc.

Firm Brochure

This brochure provides information about the qualifications and business practices of Financial Gravity Wealth, Inc. If you have any questions about the contents of this brochure, please contact us at (469) 342-9100 or by email at: wealthops@financialgravity.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.

Additional information about Financial Gravity Wealth, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Financial Gravity Wealth, Inc.'s CRD number is: 144008

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 12/03/2018

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Financial Gravity Wealth, Inc. ("FGW") on 11/30/2017 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

1. Item 1: Change email from info@financialgravity.com to wealthops@financialgravity.com
2. Item 4: Financial Planning services can be offered for a fee. (06/11/2018)
3. Item 3: Table of Contents error on page numbers (07/30/2018)
4. Item 4: Fee Additions for Linder Capital Advisors (06/11/2018)
5. Item 4: Fee Additions for Nationwide Securities, LLC (06/25/2018)
6. Item 4: Added new IAR's that are insurance agents (06/11/2018)
7. Item 10: Added new IAR's that are insurance agents, a CPA, and a lawyer (06/11/2018)
8. Item 14: Added Nationwide as a Custodian used for 401K (06/25/2018)
9. Item 1: Changed to new address Suite 150 from 120 (12/03/2018)
10. Item 4: See below changes for 12/03/2018
 - I. 4A - Changed principal owner name due to company change but owner is still the same.
 - II. 4B - Added SmartX as an Advisor, Added wording to Financial Planning and Private Placements.
 - III. 4C - Adding wording for wrap fee program.
 - IV. 4E - Updated the Amounts Under Management
11. Item 5: See below changes for 12/03/2018
 - I. 5A - Added wording in for SmartX and fee information.
 - II. 5B - Changed the wording in regard to custodial statements. Added SmartX fee information.
 - III. 5D - Updated Insurance Agents to show current IARS that are also Insurance Agents.
12. Item 8: Added in wording that the SEC required in regard to our Investment Strategy. 12/03/2018
13. Item 10: Updated the Insurance Agents, CPAs, and Lawyer section in section C to reflect updates.
14. Item 14: Adding information in section B about the Solicitors and their agreement with FGW.

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Item 4: Advisory Business

A. Description of the Advisory Firm

This firm has been in business since May of 2007, and the principal owner is Financial Gravity Companies, Inc. (OTCQB: FGCO).

B. Types of Advisory Services

Financial Gravity Wealth, Inc. (hereinafter “FGW”) offers the following services to advisory clients:

Investment Supervisory Services

FGW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. FGW creates a Risk Tolerance Assessment for each client, which outlines the client’s current situation (income, tax levels, tax situation, and risk tolerance levels) and then constructs a Risk Tolerance Assessment to aid in the selection of a portfolio that matches each client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Regular portfolio monitoring

As part of the client onboarding, FGW will assess the client’s financial situation and evaluate the current investments of each client with respect to their risk tolerance levels and time horizon. FGW will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Selection of Other Advisors

FGW may direct clients to appropriate third-party money manager(s). FGW will be compensated via a fee share from these advisors to which it directs clients. This relationship will be disclosed in each contract between FGW and the third-party money manager and each client will receive full disclosure of the relationship. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, FGW will always ensure those other advisors are properly licensed or registered as investment advisor(s). Currently, FGW has an arrangement to direct clients

to FTJ FundChoice, LLC, Equis Capital Management, Inc, and HedgeCoVest LLC/SMArtX (hereafter will be referred to as SMArtX).

Financial Planning

FGW will allow Investment Advisor Representatives to offer financial planning for a fee if the client is given a detailed contract outlining the services from the Advisor. The Investment Advisor Representative is responsible for completing this document which will outline the fees that can be charged along with a detailed list of the services. This client will need to be recorded in the Compliance CRM as a client and complete the required documents just like any other wealth client.

Private Placements

Our affiliated agents may refer private placement products. Private placements can carry a substantial risk and should adhere to the overall philosophies of Financial Gravity Wealth.

Services Limited to Specific Types of Investments

FGW limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, third party money managers, REITs, private placements, government securities. FGW may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

FGW offers the same suite of services to all of its clients. However, specific investment allocations and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent FGW from properly servicing the client account, or if the restrictions would require FGW to deviate from its standard suite of services, FGW reserves the right to end the relationship.

D. Wrap Fee Programs

FGW does not participate in any wrap fee programs however, FGW does work with and recommend Equis Capital Management, Inc. as well as SMArtX. Both of these third-party Advisors do offer wrap fee programs.

E. Amounts Under Management

FGW has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$168,353,109.00	\$0.00	12/03/2018

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
\$1 - \$3,000,000	1.00%
Above \$3,000,000	0.75%

These fees are negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

Clients may terminate the contract without penalty, for full refund, within 5 business days of signing the advisory contract. Thereafter, clients may terminate their contracts with thirty days' written notice and clients will not have to pay the prorated fee for the month in which the contract is terminated.

Selection of Other Advisors Fees

Prior to introducing Pennsylvania clients to another investment adviser, FGW will be responsible for determining the following:

- whether the investment advisor is registered with the Pennsylvania Securities Commission under Section 301 of the Pennsylvania Securities Act of 1972 ("1972 Act") whether the investment advisor is relying on an exclusion from the definition of investment advisor under Section 102(j) of the 1972 Act;
- whether the investment advisor is relying on an exemption from registration under Section 302(d) of the 1972 Act; or

- if the investment advisor is registered with the Securities and Exchange Commission, and whether it has filed a Notification Filing with the Pennsylvania Securities Commission under Commission Regulation 303.015(a).

Eqis Capital Management, Inc.

On occasion FGW may direct clients to third party money manager Eqis Capital Management, Inc., if needed to adhere to client restrictions regarding social, religious, or moral reasons. The fee schedule is as follows:

AUM	FGW Split	Eqis Split
Eqis – ETF Platform	1.00%	0.75%
Eqis – SMA Platform	1.00%	0.95%

Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Thereafter, clients may terminate their contracts with ten days' written notice.

FTJ Fund Choice, Inc.

On occasion FGW may direct clients to a third-party money manager FTJ, if needed to adhere to client restrictions regarding social, religious, or moral reasons. The fee schedule is as follows:

AUM	FGW Split	FTJ Split
FTJ – ETF - \$0 to \$250,000	1.00%	0.20%
FTJ – ETF - \$250,000.01 to \$500,000	1.00%	0.15%
FTJ – ETF – Over \$500,000	1.00%	0.10%
FTJ – SMA Program	1.00%	0.076%

Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Thereafter, clients may terminate their contracts with ten days' written notice.

Lindner Capital Advisors, Inc.

On occasion, FGW may direct clients to use Lindner Capital Advisor portfolios. LCA's fees are based upon the portfolio you choose to invest in. We reserve the right to adjust the fee schedule, which is as follows:

AUM	FGW Split	LCA Split
Traditional, Strategic Alternative, Strategic Fixed Income, Defensive and Global Portfolios	1.00%	0.35%
Strategic Alternative Blend Portfolio	1.00%	0.42%
Tactical Economic Portfolio	1.00%	0.55%

In the event of any such adjustments, you will be provided with written notice to your address of record upon 30 days before which such change is to be instituted.

HedgeCoVest LLC/SMartX

On occasion FGW may direct clients to a third-party money manager SMartX, if needed to adhere to client restrictions regarding social, religious, or moral reasons. The fee schedule is as follows:

AUM	FGW Split	SMartX Split
FGW Managed Portfolio (this would include LCA's Portfolio's above whose fees are separate and listed above)	1.00%	0.07%
Money Manager Platform	1.00%	0.30%
Money Manager's on Platform Fees Vary	1.00%	0% - 1.5%

Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Thereafter, clients may terminate their contracts with ten days' written notice.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are paid monthly in arrears. Fees are withdrawn directly from the client's accounts with client written authorization and FGW will therefore:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Use a custodian that sends at least quarterly statements.
- (C) Use a custodian that has online access to statements.

Payment of Selection of Other Advisors Fees

Egis Capital Management, Inc.

Fees are billed monthly in arrears by Egis Capital Management, Inc., which then pays to FGW its share of the fee split. Egis Capital Management, Inc., rather than FGW, sends the client statements for these accounts. If the client terminates their agreement, management fees will be prorated based on the number of days remaining in the month at the point of termination.

FTJ Fund Choice, Inc.

Fees are billed monthly in arrears by FTJ, which then pays to FGW its share of the fee split. FTJ, rather than FGW, sends the client statements for these accounts. If the client terminates their agreement, management fees will be prorated based on the number of days remaining in the month at the point of termination.

Lindner Capital Advisors, Inc.

Fees charged for LCA services are handled through a third-party manager called HedgeCoVest LLC/SMartX. SMartX will calculate the fees and charges can be seen on the client's custodial statements.

HedgeCoVest LLC/SMartX

Fees are billed monthly in arrears by SMartX, which then pays to FGW its share of the fee split. SMartX will calculate the fees and charges can be seen on the client's custodial statements. If the client terminates their agreement, management fees will be prorated based on the number of days remaining in the month at the point of termination.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FGW. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

FGW collects its portfolio management fees in arrears.

E. Outside Compensation For the Sale of Securities to Clients

John David Pollock, Arthur David Crowley, Devin Patel, Lehman Duane Allen, Steven Anthony Bassetto, Diane Young, Mark Lumia, Richard Diamond, Edward Storer, Christopher Scott Wright, Timothy Hermes, Mark Douglas Hawkins, Jay Mangrum, Jimmy Dale Long Jr., and Hubert McIntosh are licensed insurance agents and, in this role, accept compensation for the sale of insurance products to FGW clients. This presents a

conflict of interest and gives the supervised persons an incentive to recommend insurance based on the compensation received rather than on the client's needs. However, each Investment Advisor Representative is required to base insurance sales on the best interest of the clients and based on FGW's investment philosophy seen in Item 8 of this brochure. To help mitigate the conflict of interest, FGW always acts in the best interest of the client consistent with its fiduciary duty and uses and presents the firm's investment methodology outlined in Item 8. Additionally, clients will always have the right to purchase FGW-recommended products through other brokers or agents that are not affiliated with FGW.

In addition, supervised persons will only offer insurance products to clients in the respective states in which the supervised person is properly licensed as an insurance agent.

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

FGW does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

FGW generally provides investment advice and/or management supervisory services to the following Types of Clients:

- ❖ Individuals
- ❖ Business Owners
- ❖ Entrepreneurs
- ❖ High-Net-Worth Individual

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

FGW's methods of analysis include fundamental analysis and cyclical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Factor Based Investing®

Warren Buffet said, "What's needed is a sound intellectual framework for making decisions and the ability to keep emotions from corroding that framework." Factor Based Investing® is the framework we use.

1. Reduce Tax Friction – Where possible reduce the taxes associated with owning portfolios.
2. Institutional – We seek to use institutional platforms, products and strategies.
3. Low Turnover – We seek to reduce turnover, which in turn should reduce costs and volatility of a portfolio.

The Three Factor Model make up Factors 4 – 6

Nobel Laureate Eugene Fama and researcher Kenneth French, former professors at the University of Chicago Booth School of Business, attempted to better measure market returns and, through research, found that value stocks outperform growth stocks. Similarly, small-cap stocks tend to outperform large-cap stocks.

4. Equities – We seek ownership positions instead of lending positions. For example, we would favor a stock over a bond, however we recognize the need to diversify and balance risk.
5. Value – We will lean toward a value approach to investing versus a growth approach.
6. Small – We will lean to portfolios of small stocks over large stock.
7. Modern Portfolio Theory (MPT), a hypothesis put forth by Harry Markowitz in his paper "Portfolio Selection," (published in 1952 by the *Journal of Finance*) is an investment theory based on the idea that risk-averse investors can construct portfolios to optimize or maximize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. It is one of the most important and influential economic theories dealing with finance and investment.

Factors 8 – 10 seek to minimize emotional behaviors of our clients. Quantitative Analysis of Investor Behavior ("QAIB") show that consumers emotional decisions greatly impact performance.

8. Math & Time – We focus on the quantifiable, Controlling the Controllable™ like the seven Factors above and sticking to the strategy designed.
9. Patience – Some market conditions or life events will create fear, we will encourage patience in these situations as time tends to solve the immediate fears. 2008 is a good example of this.
10. Discipline – Some market conditions will lead to chasing a “hot” asset class or a wildly popular “investment” (bitcoin is a recent example) in these

cases we will encourage our clients to stick to the plan and avoid short term greed.

Control the Controllable™

We work to control what can be controlled. An analogy we use is don't try to control the weather, take an umbrella. There are 5 areas we look to control for our clients.

Taxes – Reduce Tax Friction which comes from aggressive turnover in a portfolio.

Costs – There can be many hidden fees and costs of owning a portfolio, we seek to minimize costs where we can.

Volatility – We can't control the volatility of the market, we can manage the volatility of the portfolio.

Risk – We will engineer portfolios to a specific risk profile and it can be adjusted over time.

Diversity – We seek proper diversification, this is helped greatly by adhering to Factor Based Investing®. Most people are under diversified and concentrated in Large Cap Stocks.

Diversity Trinity®

The Diversity Trinity® looks to help define what good diversification looks like and it creates guidelines for our investors and our Investor Advisor Representatives (IAR). A graphic can be supplied on request for a better illustration. There are two basic guidelines.

A. Diversify by seeking to be In, Within and the Out.

For example, if a client had Coca-Cola stock, that is a domestic Large Cap Growth stock. So, they are "In" a single Large Cap Growth stock. We would then seek to get "Within" Large Cap Growth stocks, so we may purchase the S&P 500, then we would look to get "Out" of Large Cap Growth stocks, so we would look to international, small or other assets classes to satisfy the Diversity Trinity®

B. The 10% guideline.

In the case of a "unique" investment like Bitcoin, or an alternative investment like a non-traded REIT or a Private Placement. We encourage our clients to stick to 10% or less of their assets in any one thing and we would still encourage to seek to apply A. above. For example, with Bitcoin, we would encourage they invest in the underlying technology of

Bitcoin, block chain or encourage they own other cybercurrencies as well. In the case of a REIT we would encourage something that owns more than one building and if possible, diversifies outside just buildings with for example, mezzanine debt. The purpose of this guideline is to help adhere to #10 of Factor Based Investing.

Investment Strategies

FGW uses long term trading and short-term trading strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally hold greater risk and clients should be aware that there is a chance of material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

FGW generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither FGW nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither FGW nor its representatives are registered as a FCM, CPO, or CTA.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

John David Pollock, Arthur David Crowley, Devin Patel, Lehman Duane Allen, Steven Anthony Bassetto, Diane Young, Mark Lumia, Richard Diamond, Edward Storer, Christopher Scott Wright, Timothy Hermes, Mark Douglas Hawkins, Jay Mangrum, Jimmy Dale Long Jr., and Hubert McIntosh are licensed insurance agents.

Lehman Duane Allen, Joseph Fragnoli, Michael Joseph McCormick, Joseph Reyes, and Dean Specker are Certified Public Accountants and Carrie Quraishi is also a lawyer.

To help mitigate the conflict of interest, all supervised persons agree to adhere to the guidelines of Factor Based Investing®, the Diversity Trinity® and Controlling the Controllable™. FGW always acts in the best interest of the client consistent with its fiduciary duty. Additionally, clients will always have the right to purchase FGW-recommended products or services through other providers that are not affiliated with FGW. Moreover, supervised persons will only offer insurance products to clients in the respective states in which the supervised person is properly licensed as an insurance agent.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

FGW will direct clients to various third-party money manager(s). This relationship will be disclosed in each contract between FGW and the third-party money manager. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that FGW has an incentive to direct clients to the third party money managers that provide FGW with a larger fee split. FGW will always act in the best interests of the client, including when determining which third party manager to recommend to clients.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

B. Recommendations Involving Material Financial Interests

FGW does not recommend that clients buy or sell any security in which a related person to FGW has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of FGW may buy or sell securities for themselves that they also recommend to clients and may do so at or around the same time as clients. This may provide an opportunity for representatives of FGW to buy or sell the same securities before or after recommending securities to clients, resulting in representatives profiting off the recommendations they provide to clients. Such transactions create conflicts of interest. To address these conflicts of interest, FGW will always document any such transactions and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold. Moreover, FGW will always act in the best interest of the client consistent with its fiduciary duty.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of FGW may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FGW to buy or sell the same securities before or after trading securities for clients, resulting in representatives profiting off the recommendations they provide to clients. Such transactions create conflicts of interest. To address these conflicts of interest, FGW will always document any such transactions and will never engage in trading that operates to the client's disadvantage when trading at or around the same time as client accounts. Moreover, FGW will always act in the best interest of the client consistent with its fiduciary duty.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on FGW's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and FGW may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in FGW's research efforts. FGW will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian. FGW recommends TCA by eTrade and TD Ameritrade, while certain clients may elect to use Equity Institutional or FOLIOfn Investments, Inc.

1. Research and Other Soft-Dollar Benefits

While FGW has no formal soft dollars program in which soft dollars are used to pay for third party services, FGW may receive research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. FGW benefits by not having to produce or pay for the research, products or services, and FGW will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that FGW's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

FGW receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker-Dealer/Custodian to Use

FGW will not allow clients to direct FGW to use a specific broker-dealer to execute transactions. Clients must use FGW recommended custodian (broker-dealer). Not all investment advisers require their clients to direct brokerage. By requiring clients to use our specific custodian, FGW may be unable to achieve most favorable execution of client transactions and this may cost clients' money over using a lower-cost custodian.

B. Aggregating (Block) Trading for Multiple Client Accounts

FGW maintains the ability to block trade purchases across accounts but will rarely do so. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed periodically by John David Pollock, President or other firm assigned personnel. Accounts are rebalanced as needed and reviewers are instructed to review clients' accounts with regard to their investment policies and risk tolerance levels.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

FGW does not provide regular reports to clients, written or otherwise.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

FGW is compensated via its selection of other advisor's arrangement. FGW also has access to soft dollar benefits (as described in Item 12 above) and economic benefits (including as described below) provided by custodians.

FolioFN

FGW participates in the institutional advisor program (the "Program") offered by FOLIOfn Investments, Inc. FOLIOfn Investments, Inc. offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. FGW receives some benefits from FOLIOfn Investments, Inc. through its participation in the Program.

As part of the Program, FGW may recommend FOLIOfn Investments, Inc. to clients for custody and brokerage services. There is no direct link between FGW's participation in the Program and the investment advice it gives to its clients, although FGW receives economic benefits through its participation in the Program that are typically not available to FOLIOfn Investments, Inc. retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FGW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have FGW's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FGW by third party vendors. FOLIOfn Investments, Inc. may also pay for business consulting and professional services received by FGW's related persons. Some of the products and services made available by FOLIOfn Investments, Inc. through the Program may benefit FGW but may not benefit its client accounts. These products or services may assist FGW in managing and administering client accounts, including accounts not maintained at FOLIOfn Investments, Inc. Other services made available by FOLIOfn Investments, Inc. are intended to help FGW manage and further develop its business enterprise. The benefits received by FGW or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to FOLIOfn Investments, Inc. As part of its fiduciary duties to clients, FGW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FGW or its related persons in and of itself creates a conflict of interest and may indirectly influence the FGW's choice of FOLIOfn Investments, Inc. for custody and brokerage services.

TD Ameritrade

FGW participates in the institutional advisor program (the “Program”) offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. FGW receives some benefits from TD Ameritrade through its participation in the Program.

As part of the Program, FGW may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between FGW’s participation in the Program and the investment advice it gives to its clients, although FGW receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FGW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have FGW’s fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FGW by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by FGW’s related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit FGW but may not benefit its client accounts. These products or services may assist FGW in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help FGW manage and further develop its business enterprise. The benefits received by FGW or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, FGW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FGW or its related persons in and of itself creates a conflict of interest and may indirectly influence the FGW’s choice of TD Ameritrade for custody and brokerage services.

TCA by eTrade

FGW participates in the institutional advisor program (the “Program”) offered by TCA by eTrade. TCA by eTrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. FGW receives some benefits from TCA by eTrade through its participation in the Program.

As part of the Program, FGW may recommend TCA by eTrade to clients for custody and brokerage services. There is no direct link between FGW’s participation in the Program and the investment advice it gives to its clients, although FGW receives economic benefits through its participation in the Program that are typically not available to TCA by eTrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FGW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have FGW’s fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FGW by third party vendors. TCA by eTrade may also pay for business consulting and professional services received by FGW’s related persons. Some of the products and services made available by TCA by eTrade through the Program may benefit FGW but may not benefit its client accounts. These products or services may assist FGW in managing and administering client accounts, including accounts not maintained at TCA by eTrade. Other services made available by TCA by eTrade are intended to help FGW manage and further develop its business enterprise. The benefits received by FGW or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TCA by eTrade. As part of its fiduciary duties to clients, FGW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FGW or its related persons in and of itself creates a conflict of interest and may indirectly influence the FGW’s choice of TCA by eTrade for custody and brokerage services.

Nationwide Securities, LLC (401k use only)

FGW participates in the institutional advisor program (the "Program") offered by Nationwide Securities, LLC. Nationwide Securities, LLC offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. FGW receives some benefits from Nationwide Securities, LLC through its participation in the Program.

As part of the Program, FGW may recommend Nationwide Securities, LLC to clients for custody and brokerage services. There is no direct link between FGW's participation in the Program and the investment advice it gives to its clients, although FGW receives economic benefits through its participation in the Program that are typically not available to Nationwide Securities, LLC retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FGW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have FGW's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FGW by third party vendors. Nationwide Securities, LLC may also pay for business consulting and professional services received by FGW's related persons. Some of the products and services made available by Nationwide Securities, LLC through the Program may benefit FGW but may not benefit its client accounts. These products or services may assist FGW in managing and administering client accounts, including accounts not maintained at Nationwide Securities, LLC. Other services made available by Nationwide Securities, LLC are intended to help FGW manage and further develop its business enterprise. The benefits received by FGW or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to Nationwide Securities, LLC. As part of its fiduciary duties to clients, FGW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FGW or its related persons in and of itself creates a conflict of interest and may indirectly influence the FGW's choice of Nationwide Securities, LLC for custody and brokerage services.

B. Compensation to Non -Advisory Personnel for Client Referrals

FGW does compensate Solicitors that desire to refer new investment advisory clients to the ADVISER under the terms and conditions set forth in the Solicitor Agreement. The Solicitor is not an employee, agent or officer of the ADVISER, but is an independent contractor. Solicitor is not a person subject to a Securities and Exchange Commission order, judgment or decree and has not been convicted within the previous ten (10) years of any felony or misdemeanor or been found to have engaged in conduct prohibited under the 1940 Act or Rule 206(4)-3 thereunder. This is only offered in states that allow it.

Item 15: Custody

Investment Supervisory Services Accounts

FGW does not have custody other than via direct fee deduction. When advisory fees are deducted directly from client accounts at client's custodian, FGW will follow the procedures below.

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Utilize a custodian that sends at least quarterly invoices.
- (C) Send the qualified custodian written notice of the amount of the fee to be deducted and send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive account statements from the custodian and should carefully review those statements. FGW urges clients to compare the account statements they receive from the custodian with those they received from FGW.

Selection of Other Advisors Accounts

The third-party adviser, rather than FGW, sends the client statements for these accounts. FGW does not have custody over these accounts.

Item 16: Investment Discretion

For those client accounts where FGW provides ongoing supervision, FGW maintains limited power of authority over client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold. All buying and selling of securities is explained to clients in detail before an advisory relationship has commenced.

Item 17: Voting Client Securities (Proxy Voting)

FGW will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

FGW does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither FGW nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

FGW has not been the subject of a bankruptcy petition.