

Greenway Family Office, LLC

Client Brochure

This brochure provides information about the qualifications and business practices of Greenway Family Office, LLC. If you have any questions about the contents of this brochure, please contact us at (314) 400-5050 or by email at: jmalloy@greenwayfo.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 Greenway Family Office, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Greenway Family Office, LLC's CRD number is: 153070

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Greenway Family Office, LLC on March 28, 2019 are described below. Material changes relate to Greenway Family Office, LLC's policies, practices or conflicts of interests.

- Katherine Awbrey is no longer an Investment Adviser Representative of this firm.
- Greenway Family Office, LLC has updated outside business activities (Item 10).

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Item 4: Advisory Business

A. Description of the Advisory Firm

This firm has been in business since March 11, 2010, and the principal owner is The Malloy Group LLC.

B. Types of Advisory Services

Greenway Family Office, LLC (hereinafter “GFO”) offers the following services to advisory clients:

Investment Supervisory Services

GFO offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. GFO creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) 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
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

GFO evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. GFO will request discretionary authority from clients in order to execute transactions after discussion with 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

GFO may direct clients to third party money managers. GFO will not be compensated via a fee share from the advisors to which it directs those clients.

We provide portfolio management services through Institutional Intelligent Portfolios™, an automated, online investment management platform for use by independent investment advisors and sponsored by Schwab Wealth Investment Advisory, Inc. (the “Program” and “SWIA,” respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange traded funds (“ETFs”) and a cash allocation. The client may instruct us to exclude up to three ETFs from their portfolio. The client’s portfolio is held in a brokerage account opened by the client at SWIA’s affiliate, Charles Schwab & Co., Inc. (“CS&Co”). We are independent of and not owned by, affiliated with, or sponsored or supervised by SWIA, CS&Co or their affiliates (together, “Schwab”). The Program is described in the Schwab Wealth Investment Advisory, Inc. Institutional Intelligent Portfolios™

Disclosure Brochure (the “Program Disclosure Brochure”), which is delivered to clients by SWIA during the online enrollment process. We, and not Schwab, are the client’s investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client’s investment needs and goals, and managing that portfolio on an ongoing basis. SWIA’s role is limited to delivering the Program Disclosure Brochure to clients and administering the Program so that it operates as described in the Program Disclosure Brochure. We have contracted with SWIA to provide us with the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the “System”). The System includes an online questionnaire that helps us determine the client’s investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client’s answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client’s portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects). We do not receive a portion of a wrap fee for our services to clients through the Program. Clients do not pay fees to SWIA in connection with the Program, [but we charge clients a fee for our services as described below under Item 5 Fees and Compensation. Our fees are not set or supervised by Schwab.] Clients do not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure. We do not pay SWIA fees for its services in the Program so long as we maintain \$100 million in client assets in accounts at CS&Co that are not enrolled in the Program. If we do not meet this condition, then we pay SWIA an annual fee of 0.10% (10 basis points) on the value of our clients’ assets in the Program. This fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with CS&Co.

Wealth Management Services

GFO provides related wealth management services including cash flow budgeting, financial records organization and retention, coordination with outside advisors, philanthropy planning, and family meeting facilitation. Fees for these services will be determined and separately negotiated based on the specific needs and circumstances of the engagement. The final fee structure will be documented in Exhibit II of the Family Office Agreement. Clients may terminate their contracts without penalty, for full refund, within five (5) business days of signing the agreement.

Services Limited to Specific Types of Investments

GFO limits its investment advice to the following asset classes: cash, equities, fixed income, debt securities, mutual funds, ETFs, separately managed accounts, real estate, commodities, REITs, partnerships, fund of funds, private equity, hedge funds, direct participation programs, insurance products including annuities, and government securities. GFO may use other securities to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

GFO offers a broad suite of services to all of its clients. However, specific client financial plans 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 GFO from properly servicing the client account, or if the restrictions would require GFO to deviate from its standard suite of services, GFO reserves the right to end the relationship.

D. Wrap Fee Programs

GFO does not participate in any wrap fee programs.

E. Amounts Under Management

GFO has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$186,142,450	\$275,390,178	December 2019

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Each family's fee is determined and separately negotiated based on the specific needs and circumstances of the engagement. The fees charged will not exceed any limit imposed by the SEC.

The final fee schedule is attached as Exhibit II of the Family Office Agreement. Fees are paid monthly or quarterly in arrears, and clients may terminate their contracts with three (3) days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a month or quarter (depending upon billing period) at the point of termination. Clients may also terminate their contracts without penalty, for full refund, within five (5) business days of signing the advisory contract.

Client AUM fees will be calculated using the month end values for the accounts tracked on Fortigent, our reporting and research based platform. Fortigent performance is GIPS compliant and should be below 0.05% margin of difference compared to the statement. Fortigent's value may differ from that of the custodian as a result of Fortigent using the trade date to track transactions compared to the custodian using the settle date. Account positions can be tracked in a variety of ways across many different custodians. The way Fortigent remains consistent is taking values based on "Custodian Hierarchy". They take the price of a fund/investment from the custodian that tracks the majority of that specific fund in their system and use that price to assign the appropriate value in the Fortigent system.

Wealth Management Services Fees

Fixed Fees

Depending on the complexity of the situation and the needs of the client, the client may be charged a fixed fee. Such fees are paid monthly or quarterly in advance, and clients may terminate their contracts with three (3) days' written notice. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. Fees for these services will be determined and separately negotiated based on the specific needs and circumstances of the engagement. The final fee structure will be documented in Exhibit II of the Family Office Agreement. Clients may also terminate their contracts without penalty, for full refund, within five (5) business days of signing the advisory contract.

B. Payment of Fees

Payment of Investment Supervisory Services Fees

Advisory fees are either withdrawn directly from the client's accounts (with the client's written direction) or invoiced and billed directly to the client monthly or quarterly in arrears. Payments are due by the 5th of the month if billed monthly or by the 15th of the month if billed quarterly. Clients may select the method in which they are billed.

Payment of Wealth Management Services Fees

Fixed Wealth Management Services fees are paid via check or direct withdrawal. Fees are paid in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed 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 GFO. Please see Item 12 of this brochure regarding broker/custodian.

As described in Item 4 Advisory Business, clients do not pay fees to SWIA or brokerage commissions or other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure. Brokerage arrangements are further described below in Item 12 Brokerage Practices.

D. Prepayment of Fees

GFO collects fixed fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check or deposit into the client's account.

E. Outside Compensation For the Sale of Securities to Clients

Neither GFO nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

GFO 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

GFO generally provides wealth management and/or management supervisory services to the following Types of Clients:

- ❖ High-Net-Worth Individuals
- ❖ Trusts, Estates, or Charitable Organizations

Minimum Account Size

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

GFO uses fundamental analysis and may also contract with third-party advisory firms to conduct due diligence on certain products.

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

Investment Strategies

GFO recommends managers who employ long term trading, short term trading, short sales, margin transactions, options writing (including covered options, uncovered options, or spreading 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, short sales, margin transactions, and options writing 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

GFO generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales, margin transactions, and options writing. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a chance of material risk of loss using any of those strategies.

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 GFO 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 GFO nor its representatives are registered as a FCM, CPO, or CTA.

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

GFO may send clients to the firm's outside insurance agency, Greenway Insurance Services, LLC. This is a Missouri LLC with Robert Christopher Chorlins as manager. Greenway Family Office, LLC is the sole member of this LLC. Greenway Family Office, LLC acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Greenway Insurance Services, LLC.

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

GFO may direct clients to third party money managers. GFO will not be compensated via a fee share from the advisors to which it directs those clients. GFO 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

GFO has 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 GFO's Code of Ethics from management.

Regarding implicit referrals, GFO has disclosed the potential conflict which could arise from referring or introducing a client to a service provider who may also refer a prospective client to GFO.

GFO has made it clear to clients requesting philanthropic services that GFO sits on the boards of several charitable organizations, and while GFO believes them to be worthwhile organizations, the client is under no obligation to choose one of these organizations. GFO is not compensated in any way for referring clients or obtaining client donations through service on the boards.

No client receives preferential treatment.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of GFO may buy or sell securities for themselves that they also recommend to clients. GFO will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

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

From time to time, representatives of GFO may buy or sell securities for themselves at or around the same time as clients. GFO will always transact client business before their own when similar securities are being bought or sold.

Item 12: Brokerage Practices

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

The Custodians, Schwab Institutional, a division of Charles Schwab & Co., Inc., and TD Ameritrade were chosen based on their relatively low transaction fees and access to mutual funds, ETFs and separately managed accounts. GFO will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

In addition to our portfolio management and other services, the Program includes the brokerage services of CS&Co, a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co by entering into an account agreement directly with CS&Co. We do not open the account for the client. If the client does not wish to place his or her assets with CS&Co, then we cannot manage the client's account through the Program. As described in the Program Disclosure Brochure, SWIA may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Program.

1. Research and Other Soft-Dollar Benefits

GFO receives no research, product, or service other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that GFO must

meet in order to receive free research from the custodian or broker/dealer. There is no incentive for GFO to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. The first consideration when recommending broker/dealers to clients is best execution.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, CS&Co provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services – trading, custody, reporting and related services – many of which are not typically available to CS&Co retail customers. CS&Co also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. CS&Co's support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of CS&Co's support services: CS&Co's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that we would require a significantly higher minimum initial investment by our clients. CS&Co's services described in this paragraph generally benefit the client and the client's account. CS&Co also makes available to us other products and services that benefit us but may not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co also makes available software and other technology that: x provide access to client account data (such as duplicate trade confirmations and account statements); x facilitate trade execution and allocate aggregated trade orders for multiple client accounts; x provide pricing and other market data; x facilitate payment of our fees from our clients' accounts; and x assist with back-office functions, recordkeeping and client reporting. CS&Co also offers other services intended to help us manage and further develop our business enterprise. These services include: x educational conferences and events x technology, compliance, legal, and business consulting; x publications and conferences on practice management and business succession; and x access to employee benefits providers, human capital consultants and insurance providers. CS&Co may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. CS&Co may also provide us with other benefits such as occasional business entertainment of our personnel.

The availability of services from CS&Co benefits us because we do not have to produce or purchase them. We don't have to pay for these services, and they are not

contingent upon us committing any specific amount of business to CS&Co in trading commissions or assets in custody. With respect to the Program, as described above under Item 4 Advisory Business, we do not pay SWIA fees for its services in connection with the Program so long as we maintain \$100 Million in client assets in accounts at CS&Co that are not enrolled in the Program. In light of our arrangements with Schwab, we may have an incentive to [recommend/require] that our clients maintain their accounts with CS&Co based on our interest in receiving Schwab's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. We believe, however, that our selection of CS&Co as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of CS&Co's services and not Schwab's services that benefit only us. We have adopted policies and procedures designed to ensure that our use of Schwab's services is appropriate for each of our clients.

2. *Brokerage for Client Referrals*

GFO 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*

GFO allows clients to direct brokerage. GFO may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage investment managers hired by the client may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices.

B. Aggregating (Block) Trading for Multiple Client Accounts

Investment managers hired by the clients maintain 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, GFO does not feel that the clients are at a disadvantage due to the best execution practices of the custodians and investment managers.

Item 13: Reviews of Accounts

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

Client accounts are reviewed at least quarterly by Joan D. Malloy, and Christopher Chorlins. Joan D. Malloy is the chief advisor and is instructed to review clients' accounts

with regards to their investment policies and risk tolerance levels. All accounts at GFO are assigned to be reviewed by either Joan D. Malloy or Christopher Chorlins.

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

Each client will receive at least quarterly a written report detailing the client's account which may come from the custodian or aggregation services engaged by the client.

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)

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under Item 12 Brokerage Practices. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

B. Compensation to Non –Advisory Personnel for Client Referrals

GFO compensates solicitors for referring investment advisory clients to the firm. This arrangement is pursuant to a written agreement between the solicitor and GFO. Solicitors are compensated by sharing in the management fee collected by GFO from the solicited clients. The solicitor may have a conflict of interest in referring clients to GFO. The management fee paid by the client does not increase because the client was obtained through a solicitor. The referred client will always receive a disclosure document that contains specific details regarding the arrangement and a copy of GFO's Form ADV Part 2A.

GFO will always comply with Rule 206(4)-3 "Solicitors Rule". GFO will ensure solicitors are properly registered in all necessary jurisdictions and will not utilize the services of unregistered solicitors in any jurisdictions requiring solicitor registration.

Item 15: Custody

GFO, with client written authority, has limited custody of client's assets through direct fee deduction of GFO's fees only. If the client chooses to be billed directly by the custodians, GFO would have constructive custody over that account and must have written authorization from the client to do so. GFO may also have custody for certain other client accounts. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. GFO also has custody due to its bill paying arrangement for family office clients.

Item 16: Investment Discretion

For those client accounts where GFO provides ongoing supervision, GFO 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)

GFO 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. Investment managers hired by the clients may have or may institute proxy voting policies which differ from GFO's policy.

As described in the Program Disclosure Brochure, clients enrolled in the Program designate SWIA to vote proxies for the ETFs held in their accounts. We have directed SWIA to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third party proxy voting service provider retained by SWIA for this purpose. Additional information about this arrangement is available in the Program Disclosure Brochure. Clients who do not wish to designate SWIA to vote proxies may retain the ability to vote proxies themselves by signing a special CS&Co form available from us.

Item 18: Financial Information

A. Balance Sheet

GFO does not require nor solicit prepayment of more than \$1,200 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 GFO 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

GFO has not been the subject of a bankruptcy petition in the last ten years.