

Greenleaf Advisors LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Greenleaf Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (732) 530-8129 or by email at: info@cafarogreenleaf.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 Greenleaf Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Greenleaf Advisors LLC's CRD number is: 172332.

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

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Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment on March 21, 2019 of Greenleaf Advisors LLC. Material changes relate to Greenleaf Advisors LLC's policies, practices or conflicts of interests.

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Item 4: Advisory Business

Business Description

We provide investment advisory, consulting and fiduciary services. As a registered investment adviser, we are held to the highest standard of client care - a fiduciary standard. As a fiduciary we always put our client's interests first and must fully disclose any potential conflict of interest. We do not hold customer funds or securities, nor do we sell any investment products.

A. Description of the Advisory Firm

Greenleaf Advisors LLC (hereinafter "GAL") is a Limited Liability Company organized in the State of New Jersey. The firm was formed in July 2014. Jamie D. Greenleaf is a lead advisor, consultant and principal owner. Wayne K. Greenleaf is also an owner and functions as the Chief Compliance Officer.

B. Types of Advisory Services

Portfolio Management Services

GAL offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. GAL 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 to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

GAL evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. GAL 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.

GAL seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of GAL's economic, investment or other financial interests. To meet its fiduciary obligations, GAL attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, GAL's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is GAL's policy to allocate investment

opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Selection of Other Advisers

GAL may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, GAL will always ensure those other advisers are properly licensed or registered as an investment adviser. GAL conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. GAL then makes investments with a third-party investment adviser by referring the client to the third-party adviser. GAL will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

Pension Consulting Services

GAL offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants.

Subadviser Services

GAL may also act as a subadviser to advisers unaffiliated with GAL. These third-party advisers would outsource portfolio management services to GAL. This relationship will be memorialized in each contract between GAL and the third-party advisor.

Services Limited to Specific Types of Investments

GAL generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities, although GAL primarily recommends mutual funds, ETFs and annuities for directly managed clients, and subadvisers for other clients. Client exposure to equities, fixed income and non-U.S. securities will be through mutual funds and ETFs, and commodities will be through ETFs. Subadvisers may purchase other securities. GAL may use other securities as well to help diversify a portfolio when applicable.

Educational Seminars

GAL provides seminars to employees of our client retirement plans in the areas of specific plan features and benefits, general financial planning and education, allocation guidance within the plan.

C. Client Tailored Services and Client Imposed Restrictions

GAL will tailor a program for each individual client based on Client suitability forms and Industry standards. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by GAL on behalf of the client. GAL may use "model portfolios" together with a specific set of recommendations for each client based on their personal 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 GAL from properly servicing the client account, or if the restrictions would require GAL to deviate from its standard suite of services, GAL reserves the right to end the relationship.

D. Wrap Fee Programs

GAL participates in wrap fee programs, which are investment programs where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. GAL offers only wrap fee program with respect to its portfolio management and manager selection services, but its pension consulting services are not a wrap program. A portion of the fees paid to the wrap account program will be given to GAL as a management fee.

E. Assets Under Management

GAL has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$156,398,876.00	\$4,611,093,840.00	12/31/2019

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

Total Assets Under Management	Annual Fee
All assets	Up to 1.00%

These wrap fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of GAL's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 60 days' written notice.

GAL uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

GAL uses both quarter-end asset value, and average daily balance, depending on the client and the Provider. Individual clients are typically quarter-end value.

Selection of Other Advisers Fees

GAL may direct clients to third-party investment advisers. GAL will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between GAL and each third-party adviser. The fees shared will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected. GAL does not have any relationships in place at this time.

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Annual Fee
All assets	Up to 1.00%

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

Clients may terminate the agreement without penalty for a full refund of GAL's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 60 days' written notice. GAL uses the asset balance at the end of the quarter for purposes of determining the market value of the assets upon which the advisory fee is based. However, as per the policy of the plan provider, GAL may use the average assets of the daily balance in the client's account.

Subadviser Services Fees

GAL may also act as a subadviser to unaffiliated third-party advisers and GAL would receive a share of the fees collected from the third-party adviser's client. The fees charged are negotiable and will not exceed any limit imposed by any regulatory agency. This relationship will be memorialized in each contract between GAL and the third-party adviser.

Fixed Fees

The rate for creating client pension consulting plans is between \$100 and \$1,000,000. The final fee schedule will be attached as Exhibit II of the Investment Advisory Contract. This service may be canceled with 60 days' notice.

Educational Seminar Fees

GAL does not charge for educational seminars. This service is included as part of the comprehensive service model, fixes advisory and consulting fees.

With the Carroll acquisition, GAL now sometimes charge for participant education meetings and associated travel, as this is how some of their agreements are structured.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Asset-Based Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears. Some Providers will pay monthly.

Payment of Subadviser Fees

Subadviser fees may be withdrawn from client's accounts or clients may be invoiced for such fees, as disclosed in each contract between GAL and the applicable third-party adviser.

Payment of Fixed or Hourly Pension Consulting Services Fees

Fixed pension consulting fees are paid via check or ACH. These fees are paid in arrears upon completion.

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party adviser.

Payment of Educational Seminar Fees

GAL does not charge for educational seminars. This service is included as part of the comprehensive service model, fixed advisory and consulting fees.

C. Client Responsibility For Third Party Fees

GAL will wrap third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.) with respect to its portfolio management and manager selection services. GAL will charge clients one fee, and pay all transaction fees using the fee collected from the client. All other clients will be responsible for other fees.

D. Prepayment of Fees

GAL collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

GAL or its supervised persons may accept compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

GAL firm persons may be registered representative of a broker-dealer. In this role, they may accept compensation for the sale of securities and other products to GAL clients.

1. This is a Conflict of Interest

Supervised persons may accept compensation for the sale of securities or other investment products, including asset based sales charges or service fees from the sale of mutual funds to GAL's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, GAL will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase GAL recommended products through other brokers or agents that are not affiliated with GAL.

3. Commissions are not the Primary Source of Income for GAL

Commissions are not GAL's primary source of compensation.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

GAL 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

GAL generally provides advisory services to the following types of clients:

- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities
- ❖ State or Municipal Government Entities

Minimum Account Size

There is no account minimum for any of GAL's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

GAL's methods of analysis include charting analysis, fundamental analysis, technical analysis, quantitative analysis and modern portfolio theory.

Charting analysis involves the use of patterns in performance charts. GAL uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

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

Technical analysis involves the analysis of past market data; primarily price and volume.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

GAL uses long term trading. Subadvisers may engage in other strategies, including short term trading.

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

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

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.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models,

the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although GAL will seek to select only money managers who will invest clients' assets with the highest level of integrity, GAL's selection process cannot ensure that money managers will perform as desired and GAL will have no control over the day-to-day operations of any of its selected money managers. GAL would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

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

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The

value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you

withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

GAL firm persons that are also registered representatives of Broker/Dealers may accept compensation for the sale of securities.

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

Neither GAL nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Jamie D. Greenleaf is a registered representative of American Portfolios and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. GAL always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of GAL in such individual's capacity as a registered representative.

Jamie D. Greenleaf is an investment adviser representative with another investment advisory firm, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. GAL always acts in the best interest of the client and clients are in no way required to use the services of any representative of GAL in connection with such individual's activities outside of GAL.

Jamie D. Greenleaf acts as a pension consultant and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. GAL always acts in the best interest of the client and clients are in no way required to the services of any representative of GAL in connection with such individual's activities outside of GAL.

Jamie D. Greenleaf and Wayne K. Greenleaf are each 50% owner and managing principal of HSA Gateway LLC. Responsibilities include helping employers and employees change their behavior around retirement programs. 5 hours a month are spent on this activity during trading hours and no time is spent on this activity outside of trading hours. 10% of yearly compensation is derived from this activity.

Jamie D. Greenleaf and Wayne K. Greenleaf are passive investors with EvoShare, Inc.. EvoShare is a financial platform that enables employees to save for their 401(k) or 403(b) while shopping online and locally at stores, bars, and restaurants. Our service allows employees to spend at their favorite businesses and receive up to 30% cash-back towards their retirement plan through their employer. No time is spent on this activity during or outside of trading hours and they do not receive any compensation.

Wayne K. Greenleaf has the license of a real estate agent and has the ability to offer clients advice or products from those activities but will not. If offered, clients should be aware that these services may involve a conflict of interest. GAL always acts in the best interest of the client and clients are in no way required to accept these services of any kind.

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

GAL may direct clients to third-party investment advisers to manage all or a portion of the client's assets. GAL will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between GAL and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that GAL has an incentive to direct clients to the third-party investment advisers that provide GAL with a larger fee split. GAL will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. GAL will ensure that all recommended advisers are licensed, or notice filed in the states in which GAL is recommending them to clients.

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

A. Code of Ethics

GAL 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. GAL's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of GAL may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GAL to buy or sell the same securities before or after recommending the same securities

to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. GAL will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage 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 GAL may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of GAL to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, GAL will never engage in trading that operates to the client's disadvantage if representatives of GAL buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on GAL'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 GAL 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 GAL's research efforts. GAL will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

GAL will require clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc.

1. Research and Other Soft-Dollar Benefits

While GAL has no formal soft dollars program in which soft dollars are used to pay for third party services, GAL may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). GAL may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and GAL does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. GAL benefits by not having to produce or

pay for the research, products or services, and GAL will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that GAL's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

GAL 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*

GAL will require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

GAL does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Reviews of Accounts

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

All client accounts for GAL's advisory services provided on an ongoing basis are reviewed at least quarterly by Jamie D Greenleaf, IAR, with regard to clients' respective investment policies and risk tolerance levels. All accounts at GAL are assigned to this reviewer.

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 of GAL's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. GAL will also provide at least quarterly a separate written statement to 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)

GAL receives a fee split from subadvisers to which it allocates assets but otherwise does not receive any economic benefit, directly or indirectly from any third party for advice rendered to GAL's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

GAL may enter into written arrangements with third parties to act as solicitors for GAL's investment management services. Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. GAL will ensure each solicitor is properly registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with Rule 206(4)-3 under the Advisers Act, where applicable.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, GAL will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

GAL provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, GAL generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, GAL's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to GAL.

Item 17: Voting Client Securities (Proxy Voting)

GAL 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

GAL neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither GAL nor its management has any financial condition that is likely to reasonably impair GAL's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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