

# **Garrett Wealth Advisory Group, LLC**

*a Registered Investment Adviser*

## **Disclosure Brochure**

03/20/2020

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This brochure provides information about the qualifications and business practices of Garrett Wealth Advisory Group, LLC (hereinafter "GWAG" or the "Firm"). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

## **Item 2. Material Changes**

The material changes in this brochure from the last annual updating amendment of Garrett Wealth Advisory Group, LLC on 03/13/2019. Material changes relate to Garrett Wealth Advisory Group, LLC policies, practices or conflicts of interests only.

As of January 2020, David Wayne Garrett has a (80%) ownership interest and Brandon Garrett has a (20%) ownership in Garrett Wealth Advisory Group, LLC.

As of January 2020, We have updated the number of employees that are employed with Garrett Wealth Advisory Group.

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## Item 2. Material Changes

There are no material changes in this brochure from the last annual updating amendment of Garrett Wealth Advisory Group, LLC on March 6<sup>th</sup>, 2018. Material changes relate to Garrett Wealth Advisory Group, LLC policies, practices or conflict of interests only.

## Item 3. Services, Fees, and Compensation

The Garrett Wealth Advisory Group Wrap Fee Program (the “Program”) is an investment advisory program sponsored by GWAG.

While this brochure generally describes the business of GWAG as it relates to clients receiving services through the Program, certain sections also describe the activities of the Firm’s Supervised Persons, which refer to any officers, partners, directors (or other person occupying a similar status or performing similar functions), employees, or other persons who provide investment advice on GWAG’s behalf and are subject to the Firm’s supervision or control.

In addition to the Program, the Firm also provides investment management and financial planning services under different arrangements than those described herein. Information about these services is contained in GWAG’s Disclosure Brochure.

### **Description of the Program**

The Program is offered as a wrap fee program, which provides clients with the ability to trade in certain investment products without incurring separate brokerage commissions or transaction charges. A wrap fee program is considered any arrangement under which clients receive investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions for a specified fee or fees not based upon transactions in their accounts.

Prior to receiving services through the Program, clients are required to enter into a written agreement with GWAG setting forth the relevant terms and conditions of the advisory relationship (the “Agreement”). Clients must also open a new securities brokerage account and complete a new account agreement with LPL Financial LLC (“LPL Financial”) or another broker-dealer GWAG approves under the Program (collectively “Financial Institutions”).

Clients’ investment portfolios are generally managed on a discretionary basis by either GWAG’s investment adviser representatives or an independent investment manager (“Independent Managers”), as recommended or selected by GWAG. GWAG and/or the Independent Managers primarily allocate clients’ assets among the various investment products available under the Program, as described further in Item 6 (below).

GWAG manages client investment portfolios on a fully discretionary basis. In addition, GWAG may provide clients with wealth management services which generally includes a broad range of comprehensive financial planning and consulting services as well as discretionary management of investment portfolios.

GWAG primarily allocates client assets among various mutual funds, exchange-traded funds (“ETFs”), individual debt and equity securities, and independent investment managers (“Independent Managers”) in accordance with their stated investment objectives.

Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage GWAG to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance

and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, GWAG directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

GWAG tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. GWAG consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify GWAG if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if GWAG determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

### **Fees for the Program**

Clients in the Program pay a single annualized fee for participation in the Program (the "Program Fee"). The Program Fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by GWAG under Program. The Program Fee varies depending upon the market value of the assets under management of the client and the type of investment management services, as follows:

<b>PORTFOLIO VAULE</b>	<b>ADVISORY FEE</b>
Less than \$500,000	1.35%
\$500,001 - \$1,000,000	1.25%
\$1,000,001 - \$2,000,000	1.15%
\$2,000,001 - \$3,000,000	1.00%
\$3,000,001 - \$5,000,000	.85%
\$5,000,001 - \$7,000,000	.75%
Over \$7,000,001	Negotiable

GWAG, in its sole discretion, may negotiate to charge a lesser Program Fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

### **Fee Comparison**

The Program Fee may also include the management and transaction fees charged by the Independent Managers. Participation in the Program may cost the client more or less than purchasing such services separately. The number of transactions made in the client's accounts, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. The Program Fee may be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

### **Other Charges**

Clients may incur certain charges imposed by third parties in addition to the Program Fee such as fees charged by Independent Managers (as defined below), charges imposed directly by a mutual fund or exchange-traded fund in the account, which is disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

## **Item 4. Account Requirements and Types of Clients**

The Program participant includes individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and business entities.

### **Minimums Account Requirements**

GWAG does not impose a minimum portfolio size or minimum Program Fee. Certain Independent Managers may, however, impose more restrictive account requirements and varying billing practices than GWAG. In such instances, GWAG may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

## **Item 5. Portfolio Manager Selection and Evaluation**

### **Advisory Business**

Clients' investment portfolios are managed either directly by GWAG or through the use of certain Independent Managers on a fully discretionary basis.

GWAG primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), individual debt and equity securities, and Independent Managers, in accordance with their stated investment objectives.

Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage GWAG to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, GWAG directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

GWAG tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. GWAG consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of

their portfolios. Clients are advised to promptly notify GWAG if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if GWAG determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

### **Use of Independent Managers**

As mentioned above, GWAG may select certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set for them in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

GWAG evaluates a variety of information about Independent Managers, which may include the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent

Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. GWAG also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

GWAG continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. GWAG seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

### **Performance-Based Fees and Side-by-Side Management**

GWAG does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

### **Methods of Analysis**

GWAG utilizes a combination of fundamental, technical, and cyclical methods of analysis.

Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer.

For GWAG, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific issuer information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify

market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that GWAG will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the assessment of market conditions at a macro (entire market or economy) or micro (company specific) level, rather than focusing on the overall fundamental analysis of the health of the particular company that GWAG is recommending. The risks with cyclical analysis are similar to those of technical analysis.

### **Investment Strategies**

Prior to developing an investment strategy tailored to each client, GWAG gathers and analyzes detailed information about the client, including goals, existing investments, insurance coverage, sources of income and other assets and liabilities. The Firm then seeks to define the client's investment objectives and risk profile, which together form the basis for the selection and diversification of investments.

Once an initial investment strategy is established, GWAG's portfolio managers continually monitor its clients' portfolios, making changes as needed.

Based on client suitability, risk tolerance, and investment objectives, their assets may be placed in any one or a combination of the following models:

#### ***Conservative (Income with Capital Preservation Objective)***

Our most conservative investment objective. Emphasis is placed on generation of current income and long-term preservation of capital. A lower risk level generally means lower overall return expectations. The portfolio is constructed using a blend of open-end mutual funds and exchange-traded funds (ETF's) with special consideration given to each client's portfolio size and tax situation.

#### ***Moderately Conservative (Income with Moderate Growth Objective)***

Emphasis is placed on generation of current income with a secondary focus on moderate capital growth. The portfolio is constructed using a blend of open-end mutual funds and exchange-traded funds (ETF's) with special consideration given to each client's portfolio size and tax situation.

#### ***Balanced Income (Income with Moderate Growth or Growth with Income Objective)***

Emphasis is placed on maximizing current income and long-term income growth. The portfolio is constructed using a blend of open-end mutual funds and exchange-traded funds (ETF's) with little consideration for tax efficiency.

#### ***Moderate (Growth with Income Objective)***

Emphasis is placed on modest capital growth with some focus on generation of current income. The portfolio is constructed using a blend of open-end mutual funds and exchange-traded funds (ETF's) with special consideration given to each client's portfolio size and tax situation.

#### ***Moderately Aggressive (Growth Objective)***



Designed to achieve high long-term growth and capital appreciation. There is little focus on generation of current income resulting in a higher risk portfolio. The portfolio is constructed using a blend of open-end mutual funds and exchange-traded funds (ETF's) with special consideration given to each client's portfolio size. Tax sensitivity is generally not a factor.

***Aggressive (Aggressive Growth Objective)***

Designed to achieve high long-term growth and capital appreciation. There is no focus on generation of current income resulting in our highest risk portfolio. The portfolio is constructed using a blend of open-end mutual funds and exchange-traded funds (ETF's) with special consideration given to each client's portfolio size. Tax sensitivity is generally not a factor.

***Blue Chip Ballast (Individual Stock Strategy)***

Emphasis is placed on long-term capital appreciation with secondary objectives of dividend income and downside outperformance. The portfolio is constructed of individual publicly traded stocks that exhibit a strong competitive advantage and strong balance sheets. The companies represented in the portfolio are typically mature and relatively slower-growing resulting in a moderate risk portfolio of large cap companies. The portfolio is fairly concentrated with less than 20 stocks and is designed to be used in conjunction with other portfolio strategies.

**Risks of Loss**

**Market Risks**

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of GWAG's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that GWAG will be able to predict those price movements accurately or capitalize on any such assumptions.

**Mutual Funds and ETFs**

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

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

SGWM may recommend an investment in, or allocate assets among, various real estate investment trusts ("REITs"), the shares of which exist in the form of either publicly traded or privately placed securities. REITs are collective investment vehicles with portfolios comprised primarily of real estate and mortgage related holdings. Many REITs hold heavy concentrations of investments tied to commercial and/or residential developments, which inherently subject REIT investors to the risks associated with a downturn in the real estate market. Investments linked to certain regions that experience greater volatility in the local real estate market may give rise to large fluctuations in the value of the vehicle's shares. Mortgage related holdings may give rise to additional concerns pertaining to interest rates, inflation, liquidity and counterparty risk.

### **Business Development Companies (BDCs)**

SGWM may recommend an investment in, or allocate assets among, various business development companies ("BDCs"), the shares of which exist in the form of publicly traded securities. BDCs make equity and debt investments in small companies that are in the "start up" phase of development. Many BDCs invest in debt and equity securities of smaller companies that are privately held and lack publicly available information, which inherently subject BDC investors to the risks associated with a speculative market. BDC investors are subject to the risk that a company may default when unable to meet its obligations. The market price of securities issued by a BDC may fluctuate significantly, and BDCs investments may give rise to additional concerns pertaining to interest rates, inflation, and liquidity.

### **Variable Annuities**

SGWM may recommend an investment in various annuities. Variable annuities are contracts between an insurer and the insured under which the insurer agrees to make periodic payments to the insured after a specified period of time. The payments are variable based upon the performance of a subaccount in the insured's policy. Variable annuities are long-term retirement investments and are tax-deferred until money is withdrawn from the annuity account. Since variable annuities offer a range of investment options in the subaccounts, including stocks, bonds, and money market instruments, they subject variable annuity investors to the risks associated with market volatility.

### **Use of Independent Managers**

As stated above, GWAG may select certain Independent Managers to manage a portion of its clients' assets. In these situations, GWAG continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully

implement their investment strategies. In addition, GWAG generally may not have the ability to supervise the Independent Managers on a day-to-day basis.

#### **Voting of Client Securities**

GWAG generally does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. We may vote client securities only upon request. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

## **Item 6. Client Information Provided to Portfolio Managers**

In this Item, GWAG is required to describe the type and frequency of the information it communicates to the Independent Managers, if any, managing its clients' investment portfolios.

Clients participating in the Program generally grant GWAG the authority to discuss certain non-public information with the Independent Managers engaged to manage their accounts. Depending upon the specific arrangement, the Firm may be authorized to disclose various personal information including, without limitation: names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. GWAG may also share certain information related to its clients' financial positions and investment objectives in an effort to ensure that the Independent Managers' investment decisions remain aligned with its clients' best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of its clients' portfolios.

## **Item 7. Client Contact with Portfolio Managers**

There are no restrictions on a clients' ability to contact and consult with GWAG.

Clients may contact Independent Managers through GWAG by providing GWAG with written request and identification of the questions or issues to be discussed with the Independent Managers. After receiving the client's written request GWAG, at its sole discretion, contacts the Independent Managers for the client or arranges for the Independent Managers and the client to communicate directly.

## **Item 8. Additional Information**

#### **Disciplinary Information**

GWAG is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. GWAG does not have any required disclosures to this Item.

#### **Other Financial Industry Activities and Affiliations**

#### ***Registered Representatives of a Broker/Dealer***

Certain of the Firm's Supervised Persons are registered representatives of LPL Financial and may provide clients with securities brokerage services under a separate commission-based arrangement. The Firm's

Supervised Persons, in their individual capacities as registered representatives of LPL Financial, may provide securities brokerage services and implement securities transactions under a separate commission-based arrangement. Supervised Persons may be entitled to a portion of the brokerage commissions paid to LPL Financial, as well as a share of any ongoing distribution or service (trail) fees from the sale of mutual funds. GWAG may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with LPL Financial.

A conflict of interest exists to the extent that GWAG recommends the purchase or sale of securities where its Supervised Persons receive commissions or other additional compensation as a result of the Firm's recommendation. The Firm has procedures in place to ensure that any recommendations made by such Supervised Persons are in the best interest of clients. For certain accounts covered by the Employee Retirement Income Security Act of 1974 ("ERISA") and such others that GWAG, in its sole discretion, deems appropriate, GWAG may provide its investment advisory services on a fee-offset basis. In this scenario, GWAG may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Firm's Supervised Persons in their individual capacities as registered representatives of LPL Financial.

#### ***Licensed Insurance Agents***

A number of the Firm's Supervised Persons are licensed insurance agents and may offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that GWAG recommends the purchase of insurance products where its Supervised Persons may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

#### **Related Certified Public Accounting Firms**

GWAG does not render accounting services to clients. In the event a client requires accounting services, the Firm may recommend a certified public accountant. At times, the Firm may recommend the services of the certified public accounting firm of Snow Garrett Williams Certified Public Accountants ("SGW CPAs"). These services are rendered independent of GWAG and pursuant to a separate agreement between the client and the accounting firm. The Firm does not receive any portion of the fees paid by the client to SGW CPAs and does not receive a referral fee in connection with the accounting services that SGW CPAs renders to its clients. However, one or more of the Firm's Supervised Persons is a principal of SGW CPAs and is entitled to receive distributions relative to his ownership interest. There exists a conflict of interest to the extent that the Firm recommends the accounting services of SGW CPAs and its Supervised Persons receive compensation by virtue of their affiliation therewith.

#### **Code of Ethics**

GWAG has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. GWAG's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of GWAG's personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly affect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- A decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact GWAG to request a copy of its Code of Ethics.

### **Review of Accounts and General Reports**

GWAG monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with GWAG and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from GWAG and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from GWAG or an outside service provider.

### **Client Referrals and Other Compensation**

The Firm does not currently provide compensation to any third-party solicitors for client referrals.

**Financial Information**

GWAG is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.