

Gann^o Square of 9 Capital Advisors



Form ADV Part 2A – Firm Brochure

6136 Frisco Square Blvd.
Suite 400
Frisco, TX 75034

(469) 200-6194

www.gann9capital.com

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This Brochure provides information about the qualifications and business practices of Gann^o Square of 9 Capital Advisors (“Gann^o,” “Firm,” “we,” and “our”). If there are any questions regarding the contents of this Brochure, please contact Christopher Tave at (469) 200-6194; christopher.tave@gann9capital.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.

Gann^o Square of 9 Capital Advisors is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Gann^o Square of 9 Capital Advisors, CRD #308962, is also available on the SEC’s Web site at <http://www.adviserinfo.sec.gov>. The SEC’s website will also provide information about any persons affiliated with Gann^o Square of 9 Capital Advisors who are required to be registered as an investment adviser representative of Gann^o Square of 9 Capital Advisors.

Item 2 – Material Changes

This item discusses any material changes to the Firm's ADV Part 2A Brochure since the Firm's last annual submission.

- There are no material changes to report since this will be the Firm's first submission of Form ADV Part 2A.

Gann^o may, at any time, prepare updates to this brochure. Should this occur, Gann^o will deliver either an electronic or hard copy of the updated brochure or provide a summary of the material changes within 120 days of the close of the Firm's fiscal year, which occurs on April 30.

Clients and prospective clients are encouraged to review this brochure in its entirety.

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Item 4 – Advisory Business

In compliance with the requirements of the Texas Business Organizations Code of the 86th Legislature, located in the Texas Statutes, §1 General Provisions, Title 2, Chapter 20, and Chapter 21, Gann° Square of 9 Capital Advisors (“Gann°,” “Firm,” “we,” or “our”) was formed as a corporation in the State of Texas April 24, 2020.

Gann° Square of 9 Capital Advisors, Inc. also operates under its certified assumed name, Gann°.

This firm is 100% owned by Christopher L.G. Tave, whereby he serves as Founder, President, and Chief Compliance Officer.

Gann° offers the following Wealth Management Services:

1. Investment Management
2. Financial Planning
3. Gann° Speculative Advisory Services
 - a. Quantitative Maneuvering (Brownian Motion Analytics)
 - b. Modus Operandi Drift (Sine Wave Analytics)
4. Risk Management Consultations

Investment Management

Gann° is in the business of continuously offering wealth core advice to each of its customers (existing, prospective, and tertiary clients) to assist them in achieving their overall financial goals. One aspect of this offering is providing our customers with individually tailored Modern Portfolio Theory (MPT) investment portfolios through Gann° Investment Advisory Service (GIAS)

Through our confidential Exploratory Meeting (discovery consultation), Gann° investment adviser representatives will uncover key customer risk/return objectives, circumstances, and preferences by defining the following risk profile factors:

- time horizon
- risk tolerance
- liquidity needs
- investment history
- investment experience
- family dynamics
- sources of income

These factors will enable Gann° to initially construct a personalized investment policy statement (IPS) that will outline for the customer an investment plan (asset allocation model) designed to assist the customer in achieving their overall investment objectives.

Gann°, at this stage, will assist the customer with the implementation of their personalized investment plan should they make the decision to do so, but are not obligated.

The customer always has the right to decide whether or not to act upon our recommendations.

If the customer decides to act upon our recommendations, they will always have the right to effect the transaction/s through Gann° or elsewhere.

Should the customer choose Gann° as their agency for the implementation of their personalized investment plan, Gann° would then assist the customer in becoming a “client” by enrolling them into the Firm’s Wrap Fee Advisory Program (WFAP). This is done by setting up the appropriately titled investment account with the 3rd party custodial administrator Gann° utilizes for brokerage and investment advisory support, Betterment Securities and Betterment, LLC, respectively.

Betterment Securities is a registered Broker-Dealer who will serve as the Broker-Dealer of the client’s investable assets providing turnkey account access, statement delivery, trading, and ongoing client custodial support. Betterment Securities is a member of FINRA and SIPC.

Betterment, LLC, is a registered investment adviser Gann° uses to implement the Firm’s Wrap Fee Advisory Program. Betterment, LLC, provides the client with the best comprehensive client account advisory bundled single fee service for portfolio management, portfolio monitoring, tax-loss harvesting, and account rebalancing.

If deemed appropriate, clients may impose reasonable restrictions on the utilization of certain types of capital assets used in fulfilling their personalized investment plan/s. This would include investment vehicles not styled as socially sensitive or may be reflective of a particular industry or sector they are not particularly apathetic to.

Additional information regarding Betterment, LLC, and Betterment Securities can be found on FINRA’s BrokerCheck at <https://brokercheck.finra.org/>.

As of April 30, 2020, Gann° manages the following Assets under Management:

Discretionary	\$0.00
Non-Discretionary	\$0.00
Total Assets Under Management	\$0.00

Financial Planning

Gann^o additionally provides a broad range of Financial Planning Solutions (Financial Planning) for its customers. Financial planning is a comprehensive evaluation of a customer's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. All financial planning sessions begin with the standard Gann^o Exploratory Meeting.

Gann^o prepares financial plans to assist their customers in defining and attaining personal financial goals and objectives by addressing 13 Wealth Management Issues including but not limited to:

- A. Investment Planning
- B. Banking & Credit Management
- C. Risk Management
- D. Insurance Planning
- E. Stock Option & Employee Benefits
- F. Executive Compensation
- G. Titling of Assets
- H. Retirement Planning
- I. Business Succession Planning
- J. Estate Planning
- K. Tax Planning
- L. Education Planning
- M. Charitable Giving

The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they impact the economic and life situation of the customer.

If a customer is interested in participating in Financial Planning, a written agreement signed by the customer is required. Afterward, a Gann^o investment adviser representatives will have a private, confidential discussion with the customer to determine holdings, financial needs, and goals. Depending on the scope of the engagement, customers will be asked to provide current copies of the following documents to complete the Financial Planning process:

- Wills
- Trust
- Insurance Policies
- Mortgage Statements
- Financial data (Tax Returns, W-2's, 1099's, K-1's, etc.)
- Employer Retirement plan
- Investment Statements
- Contracts
- Divorce decree
- Financial Statements

The information must be timely and as accurate as possible. Gann° may, but are not obligated to verify the information provided by the customer. Also, it is expressly vital that all customers keep us informed of any significant changes which may call for an update to a customer's Financial Plan and/or Investment Policy Statement.

Events such as changes in employment and/or marital status, unplanned windfall/withdrawals can have an impact on circumstances and needs. Gann° needs to be aware of such events, so that we may make adjustments as necessary to keep all customers on track toward reaching their goals.

Furthermore, it may be deemed necessary that all customers provide Gann° adequate information as it relates to:

- Source of funds
- Income levels
- Asset titling
- Account ownership
- 3rd party agency authorizations

These details will assist Gann° in further determining the appropriateness of the Financial Plan and/or Investment Policy Statement.

Customers engaging in the Financial Planning service offered by Gann° will receive a written or an electronic report, providing a detailed financial plan designed to help the customer achieve their stated financial goals and personal objectives.

The customer always has the right to decide whether or not to act upon our recommendations.

If the customer decides to act upon our recommendations, they will always have the right to effect the transaction/s through Gann° or elsewhere.

Speculative Advisory Services

Gann° continuously evaluates the Capital Asset Pricing Model (CAPM) to assess what opportunities are available to include in all of its Investment Portfolios, particularly within its Proprietary Investment Management Allocation (PIMA) models. As dedicated capital asset advisors, Gann° offers clients two distinct highly speculative proprietary investment strategies:

- A. Quantitative Maneuvering (Brownian Motion Analytics)
- B. Modus Operandi Drift (Sine Wave Analytics)

Our 2 highly speculative investment models utilize both proprietary and non-proprietary algorithms (AG) to position a particular investment strategy designed to be competitive with the typical benchmark indices (S&P 500 Index, Dow Jones Industrial Average, Russell 2000 Index, etc.) The data output derived from our algorithms certainly drive the investment decisions made in constructing our highly speculative investment models. Nonetheless, our PIMA portfolio managers apply oversight and judgment in interpreting the AG data set. Additional details on methodology provided in Item 8.

Deep-seated, sensible research is the cornerstone of the Firm's investment philosophy. Forthwith, as we seek ways to continually enhance our investment strategies and processes, our PIMA portfolios may change their infrastructure from time to time to account for time and price alignments. This would be considered a normal aspect of our ongoing PIMA investment activities.

Our PIMA portfolios are recommended on a case by case basis. It is exclusive to clients who have been a Gann° client for a minimum of 2 consecutive years and have received an extensive Gann° KYC/Suitability Assessment, which should occur at most within 15 days of the implementation of the PIMA portfolio.

Risk Management Consultations

Risk is a condition whereby the possibility of an adverse deviation from the desired outcome is imminent. Risk can be financial, non-financial, static, dynamic, fundamental, particular, pure, and speculative. As such, Gann°, after the completion of its Exploratory Meeting, will always make risk assessments and, if necessary, will make apposite recommendations to assist the customer in avoiding, transferring, sharing, or reducing their particular risk factor uncovered during the discovery consultation.

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Item 5 – Fees and Compensation

Please note, unless a client has received the Firm's disclosure brochure at least 48 hours before signing any Gann° Investment Advisory Agreement, it may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees and without penalty.

Gann° is paid based upon the Gann° Wrap Fee Advisory Program Fee Matrix (listed on the following page). The assets under management (AUM) the client has with Gann° further facilitates the specific payout via the Firm's Wrap Fee Advisory Program (WFAP).

Method of payment is determined by the 3rd party custodial administrator Gann° utilizes to service its WFAP accounts. Payment is typically made by a draft from a U.S. financial institution through a qualified unaffiliated 3rd party processor, which will always require the client's authorization.

Gann° does not accept cash nor money orders.

Gann° Wrap Fee Advisory Program Fee Matrix

The implementation of all Investment Portfolios constructed via the Gann° Investment Policy Statement (IPS), are executed through Betterment, LLC, and is charged the following annualized AUM advisory bundled-single fee service-wrap fee which is assessed on a quarterly basis in arrears (annual rate divided by 4):

Assets Under Management (AUM)	Annualized Wrap Fee	Quarterly Wrap Fee
\$0 - \$249,999	.60% (60 basis points)	.15% (15 basis points)
\$250,000 - \$749,999	.50% (50 basis points)	.1250% (12.5 basis points)
\$750,000 - \$1,999,999	.40% (40 basis points)	.10% (10 basis points)
\$2,000,000 and Above	.30% (30 basis points)	.075% (7.5 basis points)

These AUM advisory bundled-single fee service-wrap fees assessed by Betterment, LLC, for Betterment Securities includes all of the services necessary for effective portfolio management:

- portfolio monitoring
- tax-loss harvesting
- account rebalancing
- mobile/web account access portals
- statement delivery
- custody of assets
- execution of trades
- clearing
- client custodial support

Bundled advisory fees may be negotiable in unique cases.

No changes in the annual fee shall be valid until a revised Gann° Investment Advisory Agreement is signed after the proper steps are taken to amend the client's IPS.

Bundled advisory fees are directly debited from the client's Betterment, LLC, accounts.

Betterment, LLC, accounts initiated or terminated during any given month will be charged a pro-rated fee based on the amount of time remaining in the billing period.

Betterment, LLC, accounts may be terminated with written notice. Since fees are paid in arrears, no rebate will be needed upon the termination of the account.

Betterment, LLC, collects AUM advisory bundled-single fee service-wrap fees from each Gann° Wrap Fee Advisory Program client under the terms of the Gann° Investment Advisory Agreement between the client and Gann°.

Financial Planning

The Gann° financial planning client-adviser relationship begins with the confidential Gann° Exploratory Meeting, which is essential to each customer's standard Risk Profile evaluation. As such, Gann° does not charge a fee for any aspect of the Financial Planning Solutions offered by Gann°.

Speculative Advisory Services

Gann° Proprietary Investment Management Allocation (PIMA) models require a minimum dollar value investment of USD 5,000,000 to participate in any of its highly speculative proprietary investment strategies.

Gann° does not charge an AUM advisory bundled-single fee service-wrap fee beyond the Gann° Wrap Fee Advisory Program Fee Matrix provided on the previous page.

Risk Management Consultations

Christopher Tave is a licensed insurance producer and is compensated by commission for the sale of any insurance products.

The practice of recommending and receiving a commission on an insurance product may present a conflict of interest.

Clients are not required to purchase any products from Christopher Tave, Gann°, nor any of its investment adviser representatives.

Other Types of Fees and Expenses

The fees of Gann°, if any, are exclusive of other related costs and expenses that may be incurred by the client. Clients may incur certain charges imposed by the custodian, Broker-Dealer, and other 3rd custodial administrators as it pertains to:

- transfer fees/taxes
- wire transfer fees
- electronic transfer fund fees
- other miscellaneous custodial fees

Mutual Funds and Exchange Traded Funds (ETF) charge internal management fees (commissions, management fees, and fund overhead), which are disclosed in the fund's prospectus. Such internal management fees are exclusive of and in addition to the AUM advisory bundled-single fee service-wrap fee, and we will not receive any portion of these internal management fees.

Item 12 further describes the factors Gann° takes into account in selecting and recommending certain Broker-Dealers to transact investment transactions on behalf of our client's in a manner that is just and reasonable based upon any fees and/or commissions.

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

Gann^o does not charge performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a client.

Gann^o does not provide side-by-side management. Side-by-Side management refers to the practice whereby an investment management company or portfolio manager, concurrently manages multiple products (i.e., mutual funds, hedge funds, and separately managed accounts (SMA's)).

Item 7 – Types of Clients

Gann^o generally provides Wealth Management Services to the following types of clients:

- Individuals
- High Net-Worth Individuals and Families
- Foundations
- Trusts
- Small Businesses
- Defined Benefit / Defined Contribution Plans
- Non-Profit Qualified Plans
- Small-Employer Plans

There is no account minimum for any of the Firm's services unless specified otherwise.

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

Method of Analysis

Gann^o may utilize one or more of the following methods of analysis when providing investment advice to its clients:

- Fundamental Analysis
- Cyclical Analysis
- Economic Analysis
- Quantitative Analysis
- Technical Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. It involves analyzing its financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives: to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. This strategy would generally 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.

Cyclical analysis assumes that markets react in cyclical patterns, which once identified, can be leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class, or an individual company's profits. Cyclical analysis is a time-based assessment that incorporates past and present performance to determine future value. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity.

The risks of this strategy are:

- the markets do not always repeat cyclical patterns
- as investors begin to implement this strategy, it changes the very cycles of which they are attempting to exploit.

Economic analysis is used to determine the economic environment over a specified time horizon. This involves following and updating historical economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for all the world's major economies.

The risk assumed is that Supply and Demand curves will shift due to extenuating circumstances.

Quantitative analysis involves using quantitative tools to determine value or opportunities embedded with a particular capital asset. Some examples are:

- Central Tendency Measures
- Chebyshev's Inequality Models
- Bayes' Formula
- Binomial Distribution Models
- Central Limit Theorem
- Linear Regression
- Heteroskedasticity Models

The risk assumed in using quantitative analysis involves what's called Model Risk. Trusting the results of a fundamentally flawed or misused model can cause significant losses compared to typical Modern Portfolio Theory based investment portfolios.

Specific to Gann[®] and its Proprietary Investment Management Allocation (PIMA) models, all aspects of Quantitative analysis is considered and utilized dependent upon discrete and continuous random variables. In some instances, the following Chaos Theory models are reviewed to uncover favorable market conditions.

- William Delbert Gann Square of 9 Methodology
- Brownian Motion Analytics
- Sine Wave Analysis

William Delbert Gann Square of 9 Methodology, is a method which squares price and time. The Square of 9 principal is a coiled sequence of numbers that starts with a value of “1” in the center of a given chart. The number increases by “1” as the analysis moves away from the center in a clockwise rotation.

William Gann explained in many of his historical white papers that each cell in the Square of 9 represents a point of vibration in any particular random system. The model further suggests the importance of time and price alignments to forecast prices.

Key numbers of importance are as follows:

- 0° or 360° (Cell# 2, 11, 28, 53, ...)
- 45° (Cell# 3, 13, 31, 57, 91, ...)
- 90° (Cell# 4, 15, 34, 61, 96, ...)
- 180° (Cell# 6, 19, 40, 69, ...)

Another key concept is the use of the Cardinal and Ordinal cross and how the number sets fall within these patterns.

Also, the pattern of a circle encompassing the four corners of the Square of 9 diagram identifies the perspective of angles relative to planetary movements measured by degrees to help in recognizing looming support and resistance levels as the price of a capital asset moves in time.

Forecasting can be rewarding yet, at times is a deeply involved process that can take months or years to construct.

Brownian motion analytics, also known as the Weiner Process, is a real value continuous-time stochastic process of various physical phenomena in which some quantity is constantly undergoing small, random fluctuations. It was named after 19th Century botanist Robert BrownError! Bookmark not defined. FRSE FRS FLS MWS epic 1827 observation of these unusual particle fluctuations. In the realm of capital asset analysis, this model is utilized to determine, within a given medium, that there is no preferred direction of random variables (price), absent of time, will oscillate. However, over some time, the particles will spread evenly throughout the medium. Gann° uses proprietary software to assist in determining Brownian motion capital asset favorable opportunities.

Sine Wave analysis is a technical indicator based upon a trigonometric function of an angle caused by a combination of price and time, which suggests when a market is trending or consolidating. This leading indicator is dependent upon a function of time, yet its benefit is the identification of the beginning and end of a particular trend.

The indicator consists of 2 lines: a Sine Wave and a Lead Wave. When the price is trending, the lines do not cross and typically run parallel and distant from each other. Crossovers between these 2 lines might indicate a turning point and could potentially be a buy or sell signal in the right conditions.

Technical analysis is a method of evaluating capital assets by relying on the assumption that market data (price and time) can help predict future market trends. Technical analysis assumes that behavioral finance influences capital asset price movements, which can enable predictability of when prices of a capital asset will rise and fall.

Investment Strategies

Gann° utilizes the following investment strategies when providing investment recommendations as it pertains to the Gann° Wrap Fee Advisory Program facilitated by Betterment, LLC:

- **Capital Preservation Portfolios:** Capital Preservation Portfolios seeks to preserve capital and provide income as an alternative to traditional bond portfolios. The portfolio attempts to mitigate some of the inherent risks associated with fixed income, such as interest rate risk, credit risk, and inflationary risk. This portfolio can invest in ETFs which contain U.S. Treasury bonds, Investment Grade Corporate, or Municipal bonds. This particular Capital Preservation strategy will attempt to outperform the Bloomberg Barclays U.S. Aggregate or the S&P Municipal Bond Index year over year. Some but not all of the risks associated with this strategy include market risk, interest rate risk, prepayment risk, and inflationary risk.
- **Balanced Portfolios:** The Balanced portfolio seeks to invest in broad asset classes, including domestic/international equity and fixed-income ETFs. The Balanced portfolio will attempt to outperform a 50/50 blend of the S&P 500 Index and Bloomberg Barclays U.S. Aggregate Bond Index. Some but not all of the risks associated with this strategy include market risk, interest rate risk, inflationary risk, currency risk, business risk, liquidity risk and reinvestment risk.
- **Aggressive Growth Portfolios:** This portfolio selects specific market sectors with high growth potential in the current market environment by using a rules-based, qualitative, and quantitative investment methodology to maximize returns. It attempts to outperform the S&P 500 index. Some but not all of the risks associated with this strategy include market risk, interest rate risk, inflationary risk, currency risk, business risk, liquidity risk and reinvestment risk.
- **Dividend Growth Portfolios:** Dividend Growth Portfolios seeks to provide a high, growing monthly dividend income stream through dividend distributions. The strategy invests in high-quality, fundamentally sound public companies with a steady history of dividend payouts (Dividend Aristocrats) and high annual dividend growth. The portfolio targets a 5% dividend yield and 5% year over year dividend growth. It secondarily emphasizes capital appreciation. Some but not all of the risks associated with this strategy include market risk, interest rate risk, inflationary risk, currency risk, business risk, liquidity risk and reinvestment risk.

- **Smart Beta Portfolios:** This portfolio seeks to achieve capital appreciation by building a concentrated portfolio of quality companies with competitive advantages and the potential for sustainable long-term growth with a lesser beta compared to the S&P 500 Index. Gann° employs a combination of quantitative screening followed by bottom-up fundamental and technical analysis, unconstrained by market cap, size, or industry. As part of our investment philosophy, Gann° utilizes risk management methods in the attempt to lower correlation to the broad market and increase risk-adjusted returns (Sharpe Ratio). The strategy is unconstrained and opportunistic, providing Gann° with the flexibility to focus on capital assets and industries, both domestic and international, that are poised to experience more significant earnings growth and price appreciation. Some but not all of the risks associated with this strategy include market risk, interest rate risk, inflationary risk, currency risk, business risk, liquidity risk and reinvestment risk.

Risk of Loss

Clients need to be aware that investing in securities involves risk of loss of the principal.

Every method of analysis has its own inherent risks. To perform an accurate market analysis, Gann° must have access to current/new market information. Gann° has no control over the dissemination rate of market information; therefore, unbeknownst to Gann°, certain analysis may be compiled with outdated market information, severely limiting the value of discreet analysis.

Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal to any specific performance level. Gann° does not represent, warrant, or imply that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

Notwithstanding the Firm's method of analysis or investment strategy, the assets within the client's investment portfolio are subject to the risk of devaluation or loss. The client should be aware that many different events can affect the value of the client's assets or portfolio including, but not limited to, changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Prepayment Risk:** The returns on the collateral for the deal can change dramatically at times if the debtors prepay the loans earlier than scheduled.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return. This primarily relates to fixed income securities.
- **Business Risk:** This risk is associated with a particular industry or a particular company within an industry.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Risk Factors relevant to specific capital assets utilized include:

- **Exchange-Traded Funds (ETF):** ETFs represent an interest in a passively managed portfolio of securities selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector. Unlike open-end mutual funds, the shares of ETFs and closed-end investment companies are not purchased and redeemed by investors directly with the fund. Instead, they are purchased and sold through Broker-Dealers in transactions on a stock exchange. Since ETF and closed-end fund shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index carry the risk that the ETFs performance may not correctly mimic the performance of the index. Investors in ETFs, closed-end funds, and other investment companies take a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and additional transaction costs.

- **Mutual Fund (MF):** The risks of investing in MF's include:
 - the price to invest in a MF is the fund's per-share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (sales loads)
 - investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs
 - investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

- **Fixed Income Securities (FI):** Prices of FI tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect FI prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest rates. For example, FI with longer maturities sometimes offer higher yields but are subject to more considerable price shifts as a result of interest rate changes than FI with shorter maturities. During periods of market illiquidity or rising interest rates, prices of callable issues are subject to increased price fluctuation.

- **Real Estate Investment Trusts (REITS):** Some potential pitfalls of investing in REITS includes, among others, the following risks:
 - possible declines in the value of real estate
 - risks related to general and local economic conditions, including increases in the rate of inflation
 - the lack of availability of mortgage funds
 - overbuilding
 - vacancies of properties
 - increases in competition, property taxes, and operating expenses
 - changes in zoning laws
 - costs resulting from the cleanup of, and liability to third parties for damages arising from environmental problems
 - casualty or condemnation losses
 - uninsured damages from floods, earthquakes or other natural disasters
 - changes in interest rates

Additionally, investing in REITS involves certain risks in addition to those risks associated with investing in the real estate industry in general. REITS are dependent upon management skills. They are not considered to be capital assets that are diversified and are subject to heavy cash flow dependency.

- **Alternative Investments (AI):** AI's, including but not limited to investment partnerships, alternative mutual funds, non-traditional ETFs, managed futures, and/or real estate related investments, may also present particular risks, such as decreased liquidity. AI's typically use derivative instruments such as options, futures, index-based instruments, and leveraging strategies. To the extent that the AI uses commodities or a commodity-based derivative, the investment return may also vary as a result of fluctuations in the supply and demand of the underlying commodities. Certain AI's may be less tax-efficient than others.

Additional risks may include:

- style-specific risk
 - speculative investment risk
 - concentration risk
 - correlation risk
 - credit risk
 - interest rate risk
 - non-diversification risk
- Municipal Bonds (MB): MB issuers face risks such as:
 - bankruptcy and litigation
 - legislation or other political event risks

These risks could have a significant effect on the ability of a municipality to make payments on the interest or principal of its MB's. Since municipalities issue MB's to finance similar types of projects, certain conditions in various sectors can affect the overall MB market. Furthermore, changes in the financial condition of one municipality may affect the overall MB market. Risks clients should be aware of in the MB market include:

- credit risk
- market risk
- interest rate risk
- credit spread risk
- selection risk
- call and redemption risk
- tax risk

These risk factors can materially and adversely affect the value of a client's assets or profits.

While the information provided is a summary of the events that may affect a client's investment returns, this list is not exhaustive.

Although the methods of analysis and investment strategies utilized by Gann^o does not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor.

Our investment approach constantly keeps the risk of loss in mind.

Clients should understand that there are inherent risks associated with investing.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a customer's evaluation of our wealth management, investment advisory business, or the integrity of our management.

Gann^o, nor any of its management personnel have been involved in legal or disciplinary events related to past or present investment clients.

Item 10 – Other Financial Industry Activities and Affiliations

Neither Gann^o nor its investment adviser representatives are registered as, or have pending applications to become, a Broker-Dealer or a representative of a Broker-Dealer.

Additionally, neither Gann^o nor its investment adviser 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.

Various associates of Gann^o are also licensed to sell insurance in Texas and other states. In providing wealth management and investment advisory services, the investment adviser representatives of Gann^o may recommend the purchase of products under circumstances where he/she would be entitled to receive a commission or other compensation in the transaction.

However, the client will be notified in advance if there is any form of commission received.

Under no circumstances will the client pay both a commission to the investment adviser representatives of Gann^o and a management fee to Gann^o on the same pool of assets.

Gann^o contracts with Betterment, LLC, and Betterment Securities to provide investment advisory and custodial services, respectively, for all Gann^o investment clients.

Gann^o receives no compensation for this selection.

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

Gann^o, as a fiduciary, has a duty of utmost good faith to act solely in the best interest of our clients. Our clients entrust us with their investable assets, which in turn places a high standard on our conduct and integrity.

Our fiduciary duty is the core principle underlying our Code of Ethics and Personal Trading Policy.

The Firm's Code of Ethics applies to all of its employees. Our Code of Ethics is comprehensive and is distributed to each employee at the time of hire, and annually thereafter. Gann^o further reinforces the Firm's Code of Ethics with annual training and on-going monitoring of employee activities.

Our Code of Ethics describes the fiduciary duties that all of our employees have to place the interests of the Gann^o client first. The Code of Ethics also requires that all employees comply with all federal securities laws applicable to Gann^o, including prohibiting trading in securities while they are in possession of material non-public information about these securities.

The Firm's Code of Ethics also includes prohibitions on acquiring securities in an initial public offering. It requires our employees to secure prior approval before purchasing securities in a private placement and requires compliance with the Internal Policy on Stock Trading described below.

Employees must also submit to our Chief Compliance Officer annual reports of their personal securities holdings, and quarterly reports of transactions in Covered Securities for their personal accounts or any account in which they have a direct or indirect beneficial interest.

"Covered Securities" are all securities except direct obligations of the United States government, money market funds, and shares of open-end investment companies registered under the Investment Company Act of 1940.

Each employee of Gann^o must sign an acknowledgment that they have read and understand the Firm's Code of Ethics.

A client may request a complete copy of our Code of Ethics by contacting Christopher Tave, at the address, telephone number or email on the cover page of this ADV Part 2A.

Since a Gann^o client may have significant positions in numerous financial securities that may be purchased by any retail investor, we maintain a strict investment policy regarding personal securities transactions. Concerning the purchase and sale of securities, Gann^o requires that our personnel never knowingly purchase or sell securities, directly or indirectly, for themselves, in any way, or at a time that could be detrimental to any client.

There are times when the Firm's employees may buy or sell securities that Gann^o also recommends to clients. Such transactions are executed in accordance with the Firm's Code of Ethics.

Gann^o requires its employees (including members of their immediate family) to submit an initial list of securities (not including mutual funds) owned to our Chief Compliance Officer.

Employees (including members of their immediate family) are required to have all trades of covered securities pre-cleared by the Chief Compliance Officer in advance of completing any transaction. Covered security means any stock, bond, future, investment contract, or any other instrument that is considered a "security" under the Investment Advisory Act of 1940, including without limitation:

- Stocks, bonds, futures, and investment contracts
- Options or securities, or indexes and currencies
- Limited partnership interests
- Foreign unit trusts and foreign mutual funds
- Private investment funds, hedge funds, and investment clubs
- Exchange-Traded Funds (ETFs)

The Chief Compliance Officer reviews the employees' duplicate brokerage statements each quarter for compliance with the Firm's policies related to securities trading.

Item 12 – Brokerage Practices

Gann[°] recommends that our clients use Betterment Securities, a registered Broker-Dealer and a member of SIPC, as their qualified custodian. Gann[°] is independently owned and is not affiliated with Betterment Securities. While we recommend that a client use Betterment Securities, the client will decide whether to do so or not. If the decision is made to move forward with a Gann[°] investment recommendation, the client will open their account with Betterment Securities by entering into an account agreement directly made with them.

Gann[°] does not technically open the account for a client, although we will assist the client in doing so.

If a client chooses not to place their assets with Betterment Securities as their custodian of record, Gann[°] would not be able to directly manage a client's investable assets through the Gann[°] Wrap Fee Advisory Program (WFAP).

Gann[°] is not a custodian, nor is there an affiliate of Gann[°] that is a custodian. As such, a client must establish a Gann[°] WFAP account maintained by a Gann[°] qualified custodian, Broker-Dealer, bank, or trust company.

Gann[°] seeks to recommend a qualified custodian that will hold a client's assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. In making this decision, Gann[°] considers a wide range of factors, including but not limited to:

- Capability to execute, clear, and settle trades or to facilitate such services
- Capability to facilitate timely transfers and payments to and from WFAP accounts
- Availability of investment advisory tools that assist Gann[°] in making investment decisions
- Competitiveness of custodial price and willingness to negotiate these prices
- Reputation, financial strength, stability, and quality of custodial services
- Quality and availability of client services support

WFAP accounts maintained by Betterment Securities on behalf of Gann[°], does not charge clients separately for custodial services. However, Betterment Securities is compensated as part of the Betterment for Advisors platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment, LLC, and access to the Betterment for Advisors platform.

The platform fee mentioned is an AUM advisory bundled-single fee service-wrap fee charged as a percentage of the investable assets a Gann[°] client has in a Betterment, LLC, account.

Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage, and other platform services are purchased separately.

However, for those clients participating in the Betterment for Advisors platform, Gann^o will have determined that by having Betterment Securities execute trades is consistent with our duty to seek “best execution” of client trading activities on their behalf. Best execution means the most favorable terms for a transaction based on all relevant factors.

Furthermore, Betterment Securities serves as Broker-Dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms. Betterment for Advisors also makes available various support services which may not be available to Betterment’s retail customers. Some of those services help Gann^o manage or administer a client account, while others help us manage and grow our business.

Betterment for Advisors support services are generally available on an unsolicited basis and at no charge to Gann^o. The following is a more detailed description of the Betterment for Advisors support platform:

- Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. Additionally, a series of model portfolios created by third-party providers are also available on the platform.
- Betterment, LLC, also makes available to Gann^o other products and services that benefit us but may not directly benefit the client. These products and services assist us in managing and administering a WFAP account, such as software and technology that may:
 - Assist with custodial services, recordkeeping, and client reporting
 - Provide access to client account data
 - Provide pricing and other market data
- By using Betterment for Advisors, Gann^o may be offered other services intended to help us manage and further develop our business enterprise. These services include:
 - Consulting on technology and business needs
 - Access to publications and conferences on practice management and business succession.

When using the Betterment for Advisors platform, Gann^o and its clients are subject to the trading policies and procedures established by Betterment Securities. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades; including the response to:

- withdrawals
- deposits
- changes to investment allocation

A client should not expect that trading on the Betterment platform is instant. As such, a client should be aware that Betterment Securities does not permit a client or Gann^o to control the specific time during a day that securities are bought or sold in an investment account.

Betterment, LLC, describes its trading policies in their Form ADV Part 2A.

As detailed in their ADV Part 2A, Betterment, LLC, generally trades on the same business day as it receives instructions from a client or Gann^o. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment, LLC, also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment, LLC, also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment, LLC, continues placing orders associated with deposit and withdrawal requests until market close. Betterment, LLC, maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment, LLC, may delay or manage trading in response to market instability.

Some of the noted products and services made available by Betterment Securities and/or Betterment, LLC, may benefit our firm but may not directly benefit a client's account, and certain research and other previously referenced services qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from Betterment Securities and/or Betterment, LLC, benefits us because we do not have to produce or purchase them.

These services may be contingent upon us committing a certain amount of business to Betterment Securities on a custodial basis. Gann^o has an incentive to recommend that a client establishes their account with Betterment Securities, based on our interest in receiving Betterment, LLC, and Betterment Securities custodial services. As a result, these services could, in fact, benefit our business. This can be deemed as a conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and Broker-Dealer is in the best interests of our clients.

Furthermore, we will act in the best interest of our clients regardless of the qualified custodian we recommend. Ongoing, Gann^o periodically conducts an assessment of any service provider we recommend, which generally involves a review of their range and quality of services, the reasonableness of fees, among other items, and in comparison, to their industry peers.

Gann^o has determined, overall, Betterment Securities offers portfolio management services and custodial services that are consistent with our duty to seek the best execution. We also periodically review policies regarding our recommending custodians to our clients in light of our commitment to seek the best execution.

Gann^o does not trade away from the client's custodian. Nor do we permit directed brokerage.

Betterment Securities may block client trades at their discretion. Their specific practices are further discussed in the Betterment, LLC, ADV Part 2A in Item 12.

Gann^o does not receive referrals from our custodian, nor are client referrals considered a factor in our selection of our custodian.

Item 13 – Review of Accounts

Gann^o regularly reviews and evaluates client accounts for compliance with each client's investment objectives, preferences, and restrictions. The Firm analyzes rates of return and allocation of assets to determine the effectiveness of our investment recommendations. Such reviews are conducted by the Chief Compliance Officer of Gann^o and shall occur at least once per calendar year.

Non-periodic reviews may be triggered by substantial market fluctuation, economic, or political events, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify Gann^o promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian, Betterment Securities.

All financial plans are reviewed upon financial plan creation and plan delivery. There is only one level of review for financial plans, and that is the total review conducted to create the financial plan.

Each financial planning client will receive the financial plan upon completion.

Item 14 – Client Referrals and other Compensation

With the partnership agreement we have with Betterment, LLC, and Betterment Securities, Gann^o receives a non-economic benefit from them in the form of support products and services provided to Gann^o and other registered investment advisors whose clients maintain their accounts at Betterment Securities. The potential conflicts of interest that may surface regarding the products and services provided are described in further detail above, in Item 12.

Additionally, the availability of these products and services is not based on us, giving any particular investment advice, such as buying specific securities or capital assets for our clients.

Furthermore, we do not pay any third-parties for prospective client referrals, nor is there a fee-sharing arrangement reflective of any solicitor engagement.

Item 15 – Custody

Gann^o does not maintain custody of any of our Wrap Fee Advisory Program (WFAP) accounts. Gann^o WFAP assets are held only through Betterment Securities, who is the qualified custodian of all Gann^o WFAP accounts. Client investable assets are not held by Gann^o nor any employee of our firm.

In keeping with this policy, Gann^o:

- Restricts the firm or an employee from serving as a trustee or having a general power of attorney over a client's account.
- Prohibits any employee from having the authority to directly withdraw securities or cash assets from a WFAP account. Although Gann^o may be deemed to have “constructive custody” of a client's holdings since we may request the withdrawal of advisory fees from an account, we will only do so through the engagement of a qualified custodian with prior written authorization only.
- Does not accept or forward client securities or stock certificates erroneously delivered to our firm.
- Will not authorize an employee to have knowledge of a client's account access if such access would allow physical control over account assets.

Betterment Securities, the custodian on record, will provide the client with account transaction confirmations and statements, which will include all debits, credits, and the AUM advisory bundled-single fee service-wrap fee for that period.

Statements are available for clients to review on the activity section of the Betterment for Advisors account portal. Additionally, statements will be available directly from Betterment Securities at least quarterly at <https://www.betterment.com/>. Statements should always be carefully reviewed and assessed for any discrepancies.

Statements are provided on at least a quarterly basis, and confirmations are provided as transactions occur within the client's account. Gann^o will not create an account statement for a client or serve as the sole recipient of an account statement.

If a client receives a report from Gann^o that includes investment performance details, it is recommended a client carefully review and compare their account statements with any performance report provided by Gann^o.

Item 16 – Investment Discretion

Gann^o receives discretionary authority from the client through the Gann^o Investment Advisory Agreement, at the beginning of the advisory relationship between Gann^o and its clients.

The Gann^o Investment Advisory Agreement sets forth the investment objectives and constraints listed within the client's Investment Policy Statement. Per the terms of the Gann^o Investment Advisory Agreement, the client gives Gann^o the authority to determine, without obtaining specific client consent, the following through the Wrap Fee Advisory Program (WFAP):

- which securities are to be bought and sold
- the amount of securities to be bought or sold
- commission rates to be paid, if any
- the Broker-Dealer to be used

Although not required by the Gann° Investment Advisory Agreement, the Gann° investment adviser representative generally discusses all transactions with the client in advance.

Item 17 – Voting Client Securities

As a matter of firm policy, Gann° does not vote proxies on behalf of clients. Although our firm provides investment advisory services, a client maintains exclusive responsibility for:

- directing how proxies solicited by issuers of securities beneficially owned by the client shall be voted
- making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings, or other events pertaining to the client's investment assets.

Clients are responsible for instructing the qualified custodian to forward to them, copies of all proxies, and shareholder communications relating to their investment holdings.

Gann° may provide clients with consulting assistance regarding proxy issues if we are notified in advance.

Item 18 – Financial Information

Gann° has no financial circumstances to report that would preclude the Firm from meeting contractual and fiduciary commitments to clients.

Furthermore, Gann° has not been the subject of any claim, bankruptcy, or other financially related proceedings.

Item 19 – Requirements for State-Registered Advisers

Gann° is solely owned by Christopher L.G. Tave. He is also the Chief Compliance Officer and serves as the Firm's investment advisor representative.

Education and business background for each relevant individual of Gann° can be found on Form ADV Part 2B brochure supplement.

Other business activities for each relevant individual of Gann° can be found on Form ADV Part 2B brochure supplement.

Gann° does not charge performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a client.

Neither Gann^o nor management personnel has been found liable in any arbitration claim alleging damages in excess of \$2,500 involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery counterfeiting or extortion or dishonest, unfair or unethical practices.

Neither Gann^o nor management personnel has been found liable in any civil, self- regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statements or omissions, theft embezzlement or other wrongful taking of property bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

Neither Gann^o nor management personnel has a relationship or arrangement with any issuer of securities

Privacy Notice to Customers

Gann^o does not disclose nonpublic personal information about a customer or former customer except as permitted by law. We restrict access to nonpublic personal information about our customers to those employees who need to know specific information to provide products or services to our customers and alert them to new, enhanced, or improved products or services we provide.

Gann^o maintains physical, electronic, and procedural safeguards that comply with federal standards to safeguard our customer's nonpublic personal information.