



Client Brochure

FORM ADV PART 2A

This brochure provides information about the qualifications and business practices of Guidance Point Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (617) 869-6653 or by email at: wdelcol@guidancepointllc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Guidance Point Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Guidance Point Advisors, LLC's CRD number is: 148768

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Item 2 Material Changes

The purpose of this Item 2 is to disclose material changes that have been made to this Brochure since the last annual update of this Brochure.

Since the filing of our last annual updating amendment, dated March 11, 2020, the only material change to report is our address change. Our new address is: 24 Sawyer Road, Wellesley, MA 02481.

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Item 4 Advisory Business

Description of the Advisory Firm

Guidance Point Advisors, LLC ("GPA") has been in business since October 2008. Wesley Austin Del Col, is the firm's managing partner and majority owner. Robert Egidio Del Col is a Preferred A unit holder. Robert Egidio Del Col is not involved in the activities of GPA. Andrew J. Walker and Benjamin J. Smith, investment adviser representatives of GPA, are Preferred B unit holders.

Types of Advisory Services

GPA provides fee-based investment supervisory services, financial planning services and retirement income planning services to advisory clients.

Investment Supervisory Services

Asset Management by Guidance Point Advisors

GPA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. GPA provides custom asset management to meet the client's objectives. These services are generally provided on a discretionary basis; however, clients may elect to have services delivered on a non-discretionary basis. Our investment philosophy is premised on diversification and asset allocation. While macroeconomic conditions, market conditions, and other quantitative measures might cause GPA to tactically shift a portfolio away from its target allocation, GPA ultimately seeks to manage the portfolios, over the long term, to each client's appropriate target allocation. GPA utilizes an investor profiling questionnaire which takes into account each client's current situation (income, time horizon, and risk tolerance levels). Based on the information collected, a Statement of Investment Selection (the Investment Policy Statement) is created for each client, to aid in the selection of a portfolio that matches each client's specific situation. Our Investment Supervisory Services include, but are not limited to, the following:

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

GPA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Investor risk ratings are documented in the Investment Policy Statement, which requires signature by each client.

Turnkey Asset Management Programs (TAMPs)

GPA does not participate in wrap fee programs, as the fees charged in the asset management programs offered through GPA do not include fees for brokerage, execution and custody; however, it does offer asset management programs through Envestnet Portfolio Solutions ("Envestnet"). In these programs, Envestnet provides various administrative and investment management services to GPA clients. Client assets may be managed on a discretionary basis by GPA through one or more of Envestnet's Advisor-Directed programs, or may be managed by GPA on a non-discretionary basis through one or more of Envestnet's Model-Driven programs. Adviser-Directed assets are managed using a similar process that GPA applies to client assets managed outside of the Envestnet program

(see "Asset Management by Guidance Point Advisors" above). Clients who participate in a model-driven program are placed in model allocations managed by Envestnet (Model-Driven) and grant Envestnet full discretionary authority over the assets placed in the program.

GPA receives a portion of the total management fee charged to clients invested through Envestnet, regardless of whether client assets are managed in the adviser-directed or model-driven programs. GPA and Envestnet are compensated for their services via a fee share arrangement. Additional information about the fees charged to a client participating in one of the Envestnet programs may be found under Item 5 in this brochure.

Financial Planning Services

Financial plans and financial planning may include recommendations for portfolio customization and may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are provided to Asset Management clients at no additional cost, but may be contracted for separately for a fixed or hourly fee, which will be documented in the Financial Planning Agreement.

Newsletter

GPA provides a quarterly newsletter, free of charge, to its clients and prospects offering general investment advice and other relevant information.

Services Are Not Limited to Specific Types of Investments

GPA does not specialize in any particular type of advisory service or provide investment advice only with respect to limited types of investments. Advice may be provided on, but is not limited to, the following types of investments: exchange listed securities, over-the-counter securities, foreign securities, warrants, options, corporate debt securities, CDs, municipal securities, mutual funds, ETFs, third party money managers, REITs, and United States government securities.

GPA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, over valuation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance. GPA may use other securities as well to help diversify a portfolio when applicable.

Client Tailored Services and Client Imposed Restrictions

GPA's services consider each client's financial needs and objectives individually, which may include retirement planning goals, college planning needs, insurance and investment planning, maintaining adequate cash reserves, or other client-specific objectives. GPA provides comprehensive guidance related to the management of a client's assets and income with these needs and objectives in mind. GPA will attempt to provide accurate and comprehensive advice and recommendations to assist clients in meeting these goals.

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

If a client engages GPA for financial planning services, GPA will tailor such services to the specific needs of the financial planning client, based on the client's current situation (income, tax levels, and risk tolerance levels).

Amounts Under Management

As of January 21, 2021, GPA had \$316,202,716 in discretionary assets under management. GPA also advised on \$13,648,016 of assets which are not considered under GPA's management.

Item 5 Fees and Compensation

Fee Schedule

Investment Supervisory Services Fees

Asset Management by Guidance Point Advisors

The management fee will typically be a flat annual fee in the range of 0.50% to 1.50%, based on the amount of assets to be managed, the client's existing fee structure upon engagement, the number of services utilized and the products selected. The final fee schedule is agreed-upon in the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with one day's written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the Investment Advisory Contract.

Fees are based on the average balance for the preceding quarter based on the beginning balance and month end balances for the quarter. The management fee is negotiable. Advisory fees are withdrawn directly from the client's accounts with the client's written authorization.

Fees for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in these products directly, without the services of GPA. In that case, the client would not receive the services provided by GPA which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by GPA to fully understand the total fees to be paid.

Client is responsible for all custodial and securities execution fees charged by the qualified custodian and executing broker-dealer. GPA fee is separate and distinct from the qualified custodian and execution fees. See discussion in Item 12 of this brochure concerning broker/custodian.

Turnkey Asset Management Programs (TAMPs)

The management fee will typically be a flat annual fee in the range of 0.50% to 1.50%, based on the amount of assets to be managed, the client's existing fee structure upon engagement, the number of services utilized and the products selected. This management fee includes the total advisory fees paid to GPA and to EPS. For Advisor-Driven accounts, EPS will receive 0.08% of the management fee. For Model-Driven accounts, EPS will receive 0.15% of the management fee. Accounts will be charged separately by the Custodian for brokerage, custody, clearing and execution charges as described below.

The final fee schedule is agreed-upon in the Envestnet Statement of Investment Selection. Fees are calculated and billed quarterly in arrears based on a percentage of the average daily fair market value of assets in the program during each calendar quarter. Fees for the first quarter will be prorated for the days the account is open. Clients may terminate their contracts with one day's written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the Statement of Investment Selection.

Financial Planning Services Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$250 and \$2,500. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. The fees are negotiable and the final fee schedule will be attached in the Financial Planning Agreement.

Hourly Fees

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is \$200. The fees are negotiable and the final fee schedule will be attached in the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

Hourly and fixed Financial Planning fees are paid via check in arrears upon project completion.

Clients Are Responsible for Third Party Fees

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

Outside Compensation for the Sale of Securities to Clients

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

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

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

Item 7 Types of Clients

GPA generally provides investment advice and/or management supervisory services to the following clients:

- Individuals
- High-Net-Worth Individuals

- Corporations or Business Entities

Minimum Account Size

There is an account minimum, \$250,000, which may be waived by the investment adviser, based on the needs of the client and the complexity of the situation.

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

Methods of Analysis and Investment Strategies

Under Item 4, we outlined our investment philosophy and investment strategy. GPA's investment strategy is premised upon diversification and asset allocation across the Asset Categories and Classes. Within each Asset Class, GPA seeks to diversify the portfolio using predominantly Exchange Trade Funds (ETFs) and Mutual Funds. From time to time and when appropriate, GPA will purchase individual stocks and bonds.

Research

GPA performs its own research and also relies on third-party analysis. In performing its own fund research and analysis, GPA will evaluate various criteria including: the fund expense ratio, the 3, 5 and 10 year fund performance, style drift, sharp ratio peer ranking, manager tenure and total assets.

For stock positions held by clients, GPA maintains a watchlist that incorporates consensus analyst ratings. This hierarchy of ratings (Sell, Hold, Buy, Outperform) can assist in informing our investment decisions when viewed in conjunction with the client's individual objectives and tax considerations.

Risks

While research suggests well allocated and diversified portfolios experience less volatility during normal market conditions, during periods of extraordinary volatility, Asset Classes tend to behave similarly thus reducing the benefit of allocation and diversification. As a result, a client can experience losses should these conditions arise.

The risks of investing in the types of securities on which GPA primarily provides investment advice are discussed below:

Foreign Securities: Strategies that invest in foreign securities involve special additional risks, including currency risk, political risk, and risk associated with varying accounting standards.

Warrants: Warrants have an expiry day and therefore a limited life. Due to leverage, buying warrants may be to one's advantage or disadvantage, and therefore it should be taken into consideration that leverage may lead to high return as well as loss. As a result of the price fluctuations in the market, the invested money may be entirely lost. However, with warrants, the risk is limited to the amount paid for the warrant, the commission and other fees. It should be considered that the technical and fundamental analyses for warrant trade are subjective and the anticipations of such analyses may not be realized.

Options: Options are complex securities and can be extremely risky. *Options involve risks and are not suitable for everyone. Option trading can be speculative in nature and carry substantial risk of loss.*

Corporate Debt: Corporate debt is subject to interest rate risk and the inherent credit risk related to the underlying credit worthiness of the various issuers, including the risk of default, and the volatility of the bond market.

REITs (Real Estate Investment Trusts): The risks associated with a REIT investment vary and depend on the unique characteristics and features of each REIT, as well as the geographical location of the investments. Some of the risks associated with investing in REITs include: **Market Risk, Income Risk, Concentration Risk, Liquidity Risk, Leverage Risk, and Refinancing Risk.** While some REITs can offer diversity based on the type of properties or region you want to invest in, such diversification could carry other risks such as sector and country regulation risk.

INVESTING DOES ENTAIL THE POSSIBILITY OF LOSS. ALL CLIENTS NEED TO BE AWARE THAT THEY CAN LOSE MONEY WITH ANY INVESTMENT, INCLUDING THEIR ENTIRE INVESTMENT.

Other risks are present through the strategy deployed by GPA as well as those inherent in ETFs, Mutual Funds, and individual securities. They include:

1. Asset Class Risk: Securities in the Fund may under perform in comparison to the general securities markets or other asset classes.
2. Concentration Risk: To the extent that a Fund's investments are concentrated in a particular country, market, industry, or asset class, the fund may be susceptible to loss due to adverse occurrences affecting that concentration.
3. Credit Risk: The Fund could be subject to the risk that debt issuers and other counterparties fail to honor their obligations.
4. Income Risk: The funds income might decrease if interest rates fall.
5. Interest Rate Risk: an increase in interest rates can cause the Fund principal to fall.
6. Issuer Risk: Fund performance depends on the performance of the securities in which the fund invests. Changes to the financial conditions of company in which the investments are made can cause the underlying securities to decline in value.
7. Liquidity Risk: Exists when a particular investment becomes hard to buy or sell. This can reduce the value of the investment.
8. Management Risk: If within a Fund, the manager chooses to invest in securities outside an Index, the strategy deployed by the manager may not experience the intended results and reduce the value of the portfolio.
9. Market Risk: Funds can lose money due to market movements and downturns.
10. Market Trading Risk: This risk includes the potential lack of an active market for shares, losses from trading on secondary markets, and disruption in the creation and redemption of share units. The result is that securities can trade at substantial premiums and discounts.
11. Non-Diversification Risk: There may be a concentrated position in securities, one or several, where performance depends on small number of issuers.
12. Passive Investment Risk: Funds where the management does not take defensive positions in declining markets. This can have a negative impact on a portfolio.
13. Securities Lending Risk: The risk that borrowers of securities might fail to return the securities in a timely manner or at all. Or a loss might be incurred when the value of the collateral decreases as well.
14. Tracking Error Risk: The performance of a portfolio or fund can deviate from its intended target or index it was to track.
15. Equity Securities Risk: Equity securities might be volatile and deviate from the returns of other asset classes. This also includes the risk associated with certain equity asset classes. For example, Emerging Markets are more risky than Developed Markets. Small-Cap companies are more risky than Mid-cap companies and Mid-Cap are more risk than Large cap.

Item 9 Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management. Notice of disciplinary history of the firm and/or its representatives can be obtained from the office of the Massachusetts securities division.

Item 10 Other Financial Industry Activities and Affiliations

Relationships that are Material to this Advisory Business and Possible Conflicts of Interests

Wesley Austin Del Col owns 10% interest in Guidance Point Retirement Services, LLC ("GPRS"), a registered investment adviser with the Securities and Exchange Commission. Wesley Austin Del Col is not involved in the advisory activities of GPRS, and thus does not devote any time to GPRS.

GPA and GPRS share investment adviser representatives ("IARs"). Pursuant to a written Letter of Agreement between GPA and GPRS, GPA provides to GPRS a portion of the advisory fee revenue these individuals earn as a result of providing advisory services to clients of GPA. GPRS is responsible for compensating these individuals for services provided on behalf of GPA. Therefore, these individuals receive no direct compensation from GPA. These IARs devote approximately 70% of their time to GPRS.

Wesley Austin Del Col and the investment adviser representatives of GPA will adhere to the standards set forth in the Code of Ethics to avoid or mitigate any potential conflict of interests that may arise. GPA will disclose these relationships prior to entering into advisory client relationships.

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

Code of Ethics

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

Clients or prospective clients may request a copy of our Code of Ethics by requesting a copy from their investment adviser representative or by contacting us at the phone number or address on the cover page of this brochure.

Recommendations Involving Material Financial Interests

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

Investing Personal Money in the Same Securities as Clients

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

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

From time to time, representatives of GPA may buy or sell securities for themselves at or around the same time as clients. GPA will always document any transactions that could be construed as conflict of interests and will always transact client business before their own when similar securities are bought or sold.

Item 12 Brokerage Practices

Factors Used to Select Custodians and/or Broker/Dealers

The qualified custodian typically recommended by GPA is Fidelity Brokerage Services LLC. Envestnet clients may also use Pershing LLC, Schwab Institutional, a division of Charles Schwab & Co., Inc. and TD AMERITRADE Institutional, Division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA. These custodians were chosen based on their connectivity to the Envestnet platform, relatively low transaction fees and access to mutual funds and ETFs. GPA will never charge a premium or commission on transactions, beyond the actual cost imposed by qualified custodian.

GPA has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client.

GPA's primary objectives when placing orders for the purchase and sale of securities for client accounts, when clients do not direct brokerage, is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. GPA will execute its transactions through an unaffiliated broker-dealer. The broker-dealer will be chosen based on the following: 1) the broker's capital depth, 2) the broker's market access, 3) the broker's transaction confirmation and account statement practices, 4) our knowledge of negotiated commission rates and spreads currently made available, 5) the nature and character of the markets for the security to be purchased or sold, 6) the desired timing of the transaction, 7) the execution, 8) clearance and settlement capabilities of the broker selected and others considered, 9) our knowledge of any actual or apparent operational problems of a broker and 10) the reasonableness of the commission or its equivalent for the specific transaction. Mutual fund transactions will be placed in no-load or load-waived share classes.

Based on the above criteria, GPA may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker. This would justify higher commissions (or their equivalent) than other transactions requiring routine services. If GPA is directed by the client to direct trades to a specific broker dealer other than the qualified custodian typically used by GPA for trade execution, it is disclosed that GPA's ability to negotiate commissions (where applicable), obtain volume discounts, or otherwise obtain best execution may not be as favorable as might otherwise be obtained.

Research and Other Soft-Dollar Benefits

There is no minimum client number or dollar number that GPA must meet in order to receive free research from the qualified custodian or broker/dealer. This is a benefit because GPA does not have to pay for the services, research or products offered by the qualified custodian or broker/dealer. This may give GPA an incentive to select a custodian or broker/dealer based on GPA's interests rather than on the client's interests.

Brokerage for Client Referrals

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

Selection of Executing Broker/Dealer

GPA considers its best execution obligations when recommending particular brokers, such as Fidelity. GPA believes any additional cost, if reasonable, would be justified in light of the factors considered when GPA seeks best execution for client transactions. The reasonableness of any additional cost is reviewed by GPA when it conducts best execution reviews, as described above.

GPA also allows clients to direct brokerage for the purpose of execution of client transactions. These clients should be aware that GPA may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost the client money because the client may receive less favorable prices than if the client accepted GPA's recommendation, as described above.

Aggregating (Block) Trading for Multiple Client Accounts

The Investment Supervisory Services provided by GPA are tailored to the specific investment objectives of the firm's clients on an individual basis. Due to this, GPA does not regularly trade the same security for multiple clients on the same day. Therefore, GPA does not aggregate client transactions. This practice may result in the client paying higher commissions or obtaining a less favorable execution price than if multiple orders for shares of the same security were combined into a single "block trade". As stated above, GPA has a fiduciary duty to seek best execution for client transactions and conducts periodic reviews of the execution it receives in placing client securities transactions.

Item 13 Reviews of Accounts

Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed upon request or at least annually by the adviser managing the account. Each of these investment adviser representatives is instructed to review clients' accounts with regard to their investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by the adviser managing the account.

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance). Additional review may be triggered by changes in risk tolerance, time horizon, or in investment objectives.

Content and Frequency of Regular Reports Provided to Clients

Each client will receive a monthly or quarterly written account statement detailing the clients account performance from their qualified custodian. Clients who utilize the services of Envestnet will also receive a written quarterly investment report from Envestnet containing: (a) statement from management, (b) activity performance summary, (c) holdings, (d) deposits and withdrawals, and (e) statement of management fee.

In addition, the client will receive other supporting reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts. The client is encouraged to notify GPA if changes occur in his/her personal financial situation.

Clients who engage GPA for financial planning services are provided a one-time financial plan/retirement plan concerning their financial situation. After the presentation of the plan, there are no further reports provided by GPA. Clients may request additional plans or reports for a fee.

Item 14 Client Referrals and Other Compensation

From time to time, GPA may compensate other parties for client referrals in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940. All such compensation will be disclosed to the client at the time of the referral as required by Rule 206(4)-3. GPA does not have any active solicitor relationships at this time.

Item 15 Custody

GPA is deemed to have custody over assets in accounts from which GPA has the authority to transfer funds to third parties via standing letter of authorization (SLOA). GPA is also deemed to have custody due to its ability to direct the custodian to pay advisory fees directly from clients' accounts.

Clients will receive monthly or quarterly written account statements from the qualified custodian and should carefully review those statements. If applicable, GPA urges clients to compare the account statements they receive from the qualified custodian with those they received from GPA.

Wesley Del Col serves as trustee for trust accounts of family members which are also clients of the firm. As Wesley Del Col's familial relationship with the beneficiaries of these trusts precedes the firm's relationship with the trusts as clients of the firm, custody is not imputed to the firm.

Item 16 Investment Discretion

For those client accounts where GPA provides ongoing supervision, clients grant discretionary authority over the investment of their assets to GPA in writing via the investment advisory agreement executed by the client, granting GPA discretion over client accounts with respect to securities to be bought and sold, the amount of securities to be bought and sold, and the broker or dealer to be used for a purchase or sale of securities for a client's account. Such authority must be in writing prior to GPA providing any discretionary advisory services.

Item 17 Voting Client Securities

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

Item 18 Financial Information

Balance Sheet

GPA does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

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

GPA does not have financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

Neither GPA nor its management persons have been the subject of a bankruptcy petition.