

Firm Brochure
(Part 2A of Form ADV)

Grodman Financial Group, LLC

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This brochure provides information about the qualifications and business practices of Grodman Financial Group, LLC. Please contact us by phone or email if you have any questions about the contents of this brochure. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC), or by any state securities authority. Registration with the State of NH or the SEC is required and does not imply a certain level of skill or training.

Additional information about Grodman Financial Group, LLC is available on the SEC's website at www.adviserinfo.sec.gov

March 31, 2022

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since its last Annual filing dated March 29, 2021, there have been no material changes to this Brochure.

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Advisory Business

Firm Description

Grodman Financial Group, LLC (GFG) was founded in 1990 by Brian Grodman.

Principal Owners

Brophy Wealth Management, LLC is the sole member of Grodman Financial Group, LLC. Stephen Brophy is the principal owner of Brophy Wealth Management, LLC

Types of Advisory Services

GFG provides personalized confidential financial planning, advisory service (asset management) to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

The initial meeting, which may be by telephone, is considered an exploratory interview to determine the extent to which financial planning and asset management may be beneficial to the client.

Asset Management

GFG provides investment supervisory services, also known as asset management services, on both a wrap and non-wrap fee basis. More information pertaining to GFG's wrap fee program can be found below and in GFG's Wrap Fee Program Brochure.

Assets are invested primarily in institutional share mutual funds purchased at net asset value (NAV) through TD Ameritrade Institutional as the custodian. Detailed information is available in the mutual fund prospectuses.

GFG may also offer investment advice and recommendations on equities (exchange-listed securities and securities traded over-the counter), corporate debt securities, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), and U. S. government securities. All recommendations will be based on the individual needs of the client.

GFG will provide scheduled meetings to review:

- ✓ Portfolio performance and changes in allocation or investments when appropriate;
- ✓ Current financial situations, and assist client in making decisions;
- ✓ Interfacing with other members of client's financial team (accountant, lawyer, plan administrator, etc.) to provide financial data, and help implement plans;
- ✓ Financial planning goals and current strategies employed to achieve the goals;
- ✓ Other issues which the client and GFG agree are appropriate for involvement.

GFG does not act as a custodian of client assets. TD Ameritrade Institutional serves as the custodian for most trades placed on the client's behalf. The client will always maintain asset control and is under no obligation to purchase any product from GFG.

On more than an occasional basis, GFG furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

Initial public offerings (IPOs) are not available through GFG.

Wrap Fee Investment Program

The wrap fee investment program (the "Program") sponsored by GFG is a fee-based asset management account that enables a Program participant to develop an investment portfolio, consistent with the participant's investment objective(s). Under the Program, a participant shall authorize GFG to allocate his/her/their/its investment assets, generally on a discretionary basis, among various investments (primarily including equity mutual funds and fixed income securities), consistent with the participant's investment objective(s).

Under the Program, the participant shall receive both investment advisory services and the execution of brokerage transactions for a single specified fee. For more information, please refer to the GFG Wrap Fee Brochure.

Hourly Planning Client Service Agreement

GFG provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$360.00.

Miscellaneous

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services. As indicated above, to the extent requested by a client, GFG may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. **Please Note:** We **do not** serve as an attorney or accountant, and no portion of our services should be construed as same. Accordingly, we **do not** prepare estate planning documents or tax returns. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.), including GFG's principal, Brian Grodman, in his separate individual capacity as a representative of APW Capital, Inc. ("APW"), an SEC registered and FINRA member broker-dealer, and as a licensed insurance agent. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from GFG and/or its representatives. The recommendation by GFG that a client purchase a securities or insurance commission product from Mr. Grodman in his individual capacity as a representative of APW and/or as an insurance agent, presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products from Mr. Grodman. Clients are reminded that they may purchase securities and insurance products recommended by GFG through other, non-affiliated broker-dealers and/or insurance agencies. **GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Use of Mutual Funds: Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that may be recommended and/or utilized by GFG independent of engaging GFG as an investment advisor. However, if a prospective client determines to do so, he/she will not receive GFG's initial and ongoing investment advisory services.

Wrap Program-Conflict of Interest. GFG provides services on a wrap fee basis as a wrap program sponsor. Under GFG's wrap program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. Participation in a wrap program may cost the client **more**

or less than purchasing such services separately. The terms and conditions of a wrap program engagement are more fully discussed in GFG's Wrap Fee Program Brochure. **Conflict of Interest.** Because wrap program transaction fees and/or commissions are being paid by GFG to the account custodian/broker-dealer, GFG could have an economic incentive to minimize the number of trades in the client's account. **See separate *Wrap Fee Program Brochure*. GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding a wrap fee arrangement and the corresponding conflict of interest a wrap fee arrangement may create.**

RETIREMENT ROLLOVERS - No Obligation/Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If GFG recommends that a client roll over their retirement plan assets into an account to be managed by GFG, such a recommendation creates a conflict of interest if GFG will earn a new (or increase its current) advisory fee as a result of the rollover. No client is under any obligation to roll over retirement plan assets to an account managed by GFG. **GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding the above and the corresponding conflict of interest presented by such engagement.**

Client Obligations. In performing our services, GFG shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify us if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Please Note: Investment Risk 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 (including the investments and/or investment strategies recommended or undertaken by GFG) will be profitable or equal any specific performance level(s).

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment allocations are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Assets Under Management

As of December 30, 2021 GFG, managed approximately \$10,750,154 in assets on a discretionary basis.

Fees and Compensation

GFG may charge an hourly fee up to \$360.00 and/or up to 1.25% of assets per year. This fee is non-negotiable.

The maximum annual Advisory Service fee is based on a flat fee or a percentage of the investable assets according to the following schedule:

VALUE OF ASSETS UNDER MANAGEMENT	ANNUAL FEE
First \$100,000	1.25%
From \$ 100,000 to \$500,000	1.00%
From \$ 500,000 to \$750,000	0.85%
From \$ 750,000 to \$1,000,000	0.70%
From \$ 1,000,000 to \$1,500,000	0.55%
From \$ 1,500,000 to \$2,000,000	0.40%
From \$ 2,000,000 to \$5,000,000	0.25%
Amount over \$5,000,000	0.20%

GFG, in its sole discretion, may charge a lesser investment advisory fee and/or provide fee discounts based upon certain criteria (i.e. historical relationship with GFG, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, competition, negotiations with client, etc.). Please Note: As a result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. ANY QUESTIONS: GFG Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Fee Billing

With the client's authorization, investment management fees are debited directly from the client's account by the custodian, TD Ameritrade Institutional. Fees are payable quarterly, in advance, meaning that fees are paid when the three-month billing period has begun.

For purposes of calculating Account Fees, the account quarter will begin on the first day the account is established. The initial Account Fee is due at the beginning of the quarter following execution of this agreement and will include the prorated fee for the initial quarter in addition to the standard quarterly fee for the upcoming quarter.

Subsequent Account Fee payments are due and will be assessed near the beginning of each quarter based on the value of the account assets under management at the approximate end of the preceding quarter. Upon termination, GFG shall refund the prorated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Expense Ratios

Mutual funds and exchange-traded funds generally charge a management fee annually for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.50% for their services. These fees will be in addition to the fees paid by you to GFG.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

GFG reserves the right to stop work on any account that is more than 30 days overdue. In addition, GFG reserves the right to terminate any financial planning engagement where a

client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in GFG's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within the next quarterly billing cycle.

Securities Commission Transactions

In the event that the client desires, the client can engage GFG's representatives, in their individual capacities, as registered representatives of APW, a FINRA member broker-dealer, to implement investment recommendations on a commission basis. In the event the client chooses to purchase investment products through APW, APW will charge brokerage commissions to effect securities transactions, a portion of which commissions APW shall pay to GFG's representatives, as applicable. The brokerage commissions charged by APW may be higher or lower than those charged by other broker-dealers. In addition, APW, as well as GFG's representatives, relative to commission mutual fund purchases, may also receive additional ongoing Rule 12b-1 fees directly from the mutual fund company during the period that the client maintains a mutual fund investment.

1. **Conflict of Interest:** The recommendation that a client purchase a commission product from APW presents a conflict of interest, as the receipt of commissions provides an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from GFG's representatives. **GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Please Note:** Clients may purchase investment products recommended by GFG through other, non-affiliated broker dealers or agents.
3. GFG does not receive more than 50% of its revenue from advisory clients as a result of commissions or other compensation for the sale of investment products GFG recommends to its clients.
4. When GFG's representatives sell an investment product on a commission basis, GFG does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, GFG's representatives do not also receive commission compensation for such advisory services.

Performance-Based Fees

Neither GFG nor any supervised person of GFG accepts performance-based fees.

Types of Clients

GFG generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

In general, the minimum account size for new clients is \$500,000 of investable assets. GFG may waive the \$500,000 minimum on an individual basis. Accounts that are below this minimum may be accepted on an individual basis and at the discretion of GFG.

GFG in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g. historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition.)

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include fundamental and technical analysis.

The main sources of information include financial newspapers and magazines and research materials prepared by others. GFG may also use Morningstar Office mutual fund information as another source.

Investment Strategies

The investment strategy for each client is based upon the objectives and information stated by the client during consultations. The client may change these objectives at any time. Other strategies may include long-term and short-term purchases.

Risk of Loss

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 today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **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 (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **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.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

As an insurance agent, Mr. Grodman receives commissions from various insurance companies. As a registered representative of APW, Mr. Grodman received commissions for the sale of mutual funds and other investments.

APW serves as the broker/dealer for directly held investments. Grodman Financial Group, LLC is independent of APW.

Grodman Financial Group is wholly owned by Brophy Wealth Management, LLC a Registered Investment Advisor (RIA) firm. Brophy Wealth Management provides back office support to GFG and may render advice to GFG clients and expects that the clients of GFG will become clients of BWM in the near future. The only conflict of interest that these relationships present is that clients of GFG may receive different advice and be subject to different fee arrangements than clients of Brophy Wealth Management. We mitigate this conflict of interest by disclosing it to clients.

Please Note-Conflict of Interest: The recommendation by GFG that a client purchase a securities or insurance commission product from Mr. Grodman in his individual capacity as a representative of APW and/or as an insurance agent, presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products from Mr. Grodman. Clients are reminded that they may purchase securities and insurance products recommended by GFG through other, non-affiliated broker-dealers and/or insurance agencies. **GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

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

GFG maintains an investment policy relative to personal securities transactions. This investment policy is part of GFG's overall Code of Ethics, which serves to establish a standard of business conduct for all of GFG's representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, GFG also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by GFG or any person associated with GFG.

Neither GFG, nor any related person of GFG, recommends, buys, or sells for client accounts, securities in which GFG or any related person of GFG has a material financial interest.

GFG and/or representatives of GFG may buy or sell securities that are also recommended to clients. This practice may create a situation where GFG and/or representatives of GFG are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if GFG did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of GFG's clients) and other potentially abusive practices.

GFG has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of GFG's "Access Persons." GFG's securities transaction policy requires that Access Person of GFG must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Furthermore, Access Persons must provide the Chief Compliance Officer with a quarterly transaction report, detail all trades in the Access Person's account during the previous quarter; and on an annual basis, each Access Person must provide the Chief Compliance Officer with a written report of the

Access Person's current securities holdings. However, at any time that GFG has only one Access Person, he or she shall not be required to submit any securities report described above.

GFG and/or representatives of GFG may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where GFG and/or representatives of GFG are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above, GFG has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of its Access Persons.

Brokerage Practices

GFG participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated FINRA-registered broker/dealer. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. GFG receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Client Referrals and Other Compensation below.)

In the event that the client requests that GFG recommend a broker-dealer/custodian for execution and/or custodial services, GFG generally recommends that investment advisory accounts be maintained at TD Ameritrade. Prior to engaging GFG to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with GFG setting forth the terms and conditions under which GFG shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that GFG considers in recommending TD Ameritrade (or any other broker-dealer/custodian to clients) include historical relationship with GFG, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by GFG's clients shall comply with GFG's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where GFG determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although GFG will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, GFG's investment advisory fee.

Non-Soft Dollar Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, GFG may receive from TD Ameritrade (or another broker-dealer/custodian, investment manager, platform or fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist GFG to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by GFG may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by GFG in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist GFG in managing and administering client accounts. Others do not directly provide such assistance, but rather assist GFG to manage and further develop its business enterprise.

GFG's clients do not pay more for investment transactions effected and/or assets maintained at TD Ameritrade as a result of this arrangement. There is no corresponding commitment made by the GFG to TD Ameritrade or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding conflict of interest such arrangements create.

Brokerage for Client Referrals. GFG does not receive referrals from broker-dealers.

Directed Brokerage. As indicated above, GFG generally recommends that its clients utilize the brokerage and custodial services provided by TD Ameritrade. GFG does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and GFG will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by GFG. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note:** In the event that the client directs GFG to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through GFG. Higher transaction costs adversely impact account performance. **Please Also Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

Order Aggregation: The vast majority of transactions effected by GFG for client accounts are open-end mutual funds. Transactions for each client account generally will be effected independently. To the extent applicable relative to exchange listed equity purchases, GFG may determine to purchase or sell the same securities for several clients at approximately the same time. In such situations, GFG may (but is not obligated to) combine or "bunch" such orders when it believes that it might result in obtaining better price execution.

Review of Accounts

Periodic Reviews

GFG is responsible for the periodic review, if requested, of each client. Reviews may also be conducted when there is knowledge of the client's needs or financial objectives change or when there is a change in economic and/or market conditions. Reviews can be conducted in person or by phone.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Clients may request a review and report of their accounts at any time. Clients will receive investment confirmations and statements from the investment companies used in their portfolio. Clients will also receive portfolio performance reports at the time of their review. Clients may also receive access to online viewing of their accounts upon request.

Client Referrals and Other Compensation

As referenced above, GFG receives economic benefits from TD Ameritrade in that GFG, without cost (and/or at a discount), may receive support services and/or products from TD Ameritrade.

GFG's clients do not pay more for investment transactions effected and/or assets maintained at TD Ameritrade as a result of this arrangement. There is no corresponding commitment made by GFG to TD Ameritrade or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

GFG's Chief Compliance Officer, Stephen Brophy, remains available to address any questions that a client or prospective client may have regarding the above arrangement and the conflict of interest presented.

Incoming Referrals

GFG does not compensate individuals or entities for prospective client introductions.

Referrals Out

GFG does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

GFG shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. GFG may also provide a written periodic report summarizing account activity and performance.

Please Note: To the extent that GFG provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by GFG with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of GFG's advisory fee calculation.

GFG provides other services on behalf of its clients that require disclosure at ADV Part 1, Item 9. In particular, certain clients have signed asset transfer authorizations that permit the qualified custodian to rely upon instructions from GFG to transfer client funds to "third parties." In accordance with the guidance provided in the SEC Staff's February 21, 2017 Investment Adviser Association No-Action Letter, the affected accounts are not subjected to an annual surprise CPA examination.

Investment Discretion

GFG does accept limited discretionary authority to manage securities accounts on behalf of clients. GFG does have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold, and the timing of the transaction. GFG only obtains this limited discretion per the written agreement of each individual client. Without this signed agreement limited discretion is not authorized. The client approves the custodian to be used and the commission rates paid to the custodian. GFG does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Voting Client Securities

GFG does not vote proxies on securities. Clients are expected to vote their own proxies. When assistance on voting proxies is requested, GFG will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Financial Information

GFG does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because GFG does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.
