

# **LGT Financial Advisors LLC**

## **Firm Brochure**

### **Dated: March 29, 2023**

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**This brochure provides information about the qualifications and business practices of LGT Financial Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (214) 461-1539 or [miker@lgt-fa.com](mailto:miker@lgt-fa.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 LGT Financial Advisors LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**References herein to LGT Financial Advisors LLC as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.**

## Item 2 Material Changes

This section discusses material revisions to this Brochure since LGT Financial Advisors LLC's last Annual Amendment filing on March 31, 2022.

The firm has updated this brochure to reflect the firm's Chief Compliance Officer, Michael S. Radoff.

Item 4 – Advisory Business – All employees acting in the capacity of registered representative of Investment Security Corporation ("ISC"), an SEC registered and FINRA member broker dealer, have terminated their registration with ISC effective January 3, 2023. We have removed any reference to ISC, the capacity of the individuals as a registered representative with ISC, and the related conflicts of interest associated with this relationship.

Item 5 – Fees and Compensation – We have removed any reference to ISC, related conflicts of interest, and commission compensation received by individuals who were previously acting individually in the capacity of registered representatives with ISC. We have also updated the fee schedule.

Item 10 – Other Financial Industry Activities and Affiliations – We have removed the affiliation of certain individuals in their capacity of a registered representative with ISC.

Other non-material updates were made within this Brochure, so we urge prospective and current clients to read the document in its entirety

**ANY QUESTIONS: LGT Financial Advisors' Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that an existing or prospective client may have regarding this Brochure.**

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#### Item 4            **Advisory Business**

- A. LGT Financial Advisors LLC (the “Registrant”) is a limited liability company formed on September 30, 1998 in the State of Texas. Registrant became registered as an Investment Adviser Firm in May 2001. Registrant is principally owned by its Managing Member, Lane Gorman Trubitt, LLC.
- B. As discussed below, Registrant offers investment advisory services to its clients, and, to the extent specifically requested by a client, financial planning, insurance transactions, and related consulting services.

#### **INVESTMENT ADVISORY SERVICES**

The client can determine to engage Registrant to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis.

#### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent requested by a client, Registrant may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Prior to engaging Registrant to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* with Registrant setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Registrant commencing services. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes, including Registrant’s representatives in their individual capacities as accountants and/or licensed insurance agents. (*See* disclosure at Item 10.A). 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 Registrant. Please Note: If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. Please Also Note: It remains the client’s responsibility to promptly notify Registrant if there is ever any change in their financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant’s previous recommendations and/or services.

#### **MISCELLANEOUS**

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** As indicated above, to the extent requested by the client, Registrant may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Registrant does not serve as a law firm or accounting firm, and no portion of its services should be construed as legal or accounting services. Accordingly, Registrant does not prepare estate planning documents or tax returns. To the extent requested by a client, Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.), including representatives of Registrant in their separate individual capacities as licensed insurance agents. 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 Registrant and/or its representatives. If the client engages any recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. The

recommendation by Registrant's representative that a client purchase an insurance commission product through Registrant's representative in his/her separate and individual capacity as an insurance agent, presents a conflict of interest, as the receipt of commissions provides an incentive to recommend insurance products based on the additional compensation to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products through such a representative. Clients are reminded that they may purchase insurance products recommended by Registrant through other insurance agencies. Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

**Retirement Rollovers:** 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). When Registrant provides rollover advice to a client or prospect regarding a retirement plan account or individual retirement account, Registrant is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. If Registrant recommends that a client roll over their retirement plan assets or transfer an IRA into an account to be managed by Registrant, and Registrant will earn an advisory fee on the rolled over assets, that recommendation creates a conflict of interest. Accordingly, Registrant operates under a special rule that requires Registrant to act in the client's or prospect's best interest and not put the Firm's interest ahead of the client's or prospect's. No client or prospect is under any obligation to roll over retirement plan assets or transfer IRA assets to an account managed by Registrant. LGT FA's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have.

**Non-Discretionary Service Limitations.** Clients that decide to engage Registrant on a non-discretionary investment advisory basis must be willing to accept that Registrant cannot effect any account transactions without obtaining prior consent to such transaction(s) from the client. Thus, in the event that Registrant would like to make a transaction for a client's account (including in the event of an individual holding or general market correction), and the client is unavailable, the Registrant will be unable to effect the account transaction(s) (as it would for its discretionary clients) without first obtaining the client's consent.

**Unaffiliated Private Investment Funds.** Registrant, on a non-discretionary basis, may also recommend that certain qualified clients consider an investment in unaffiliated private investment funds. Registrant's role relative to the private investment funds shall be limited to its initial and ongoing due diligence and investment monitoring services. If a client determines to become a private fund investor, the amount of assets invested in the fund(s) shall be included as part of "assets under management" for purposes of Registrant calculating its investment advisory fee. Registrant's clients are under absolutely no obligation to consider or make an investment in a private investment fund.

Private investment fund investments generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may own, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a subscription agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund, and acknowledges and accepts the various risk factors that are associated with such an investment.

In the event that Registrant references private investment funds owned by the client on any supplemental account reports prepared by Registrant, the value for all private investment funds owned by the client will reflect the most recent valuation provided by the fund sponsor. If no updated valuation is provided by the fund sponsor, then the valuation will reflect the initial purchase price or the most current value provided by the fund sponsor. Any value reflected in an account report could be significantly more or less than the original purchase price. The client's advisory fee will be based upon the most recent value provided by the fund sponsor or the initial purchase price.

**Use of Mutual Funds and Exchange-Traded Funds.** Most mutual funds and exchange-traded funds are available directly to the public. A client or prospective client can obtain the securities used by Registrant without engaging Registrant as an investment adviser. However, if a client or prospective client determines to do so, they will not receive the Registrant's initial and ongoing investment advisory services.

**eMoney Advisor/Black Diamond Wealth Platforms.** Registrant may provide its clients with access to an online platform hosted by eMoney Advisor ("eMoney") and/or Black Diamond Wealth Platform ("Black Diamond"). The platforms allow a client to view their complete asset allocation, including those assets that Registrant does not manage (the "Excluded Assets"). Registrant does not provide investment management, monitoring, or implementation services for the Excluded Assets. Therefore, Registrant shall not be responsible for the investment performance of the Excluded Assets. Rather, the client and/or their advisors that maintain management authority for the Excluded Assets, and not Registrant, shall be exclusively responsible for such investments, including their investment performance. The client may choose to engage Registrant to manage some or all of the Excluded Assets pursuant to the terms and conditions of an *Investment Advisory Agreement* between Registrant and the client. Registrant shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the platforms without Registrant's assistance or oversight. Finally, eMoney also provides access to other types of information, including financial planning concepts, which should not, in any manner whatsoever, be construed as services, advice, or recommendations provided by Registrant.

**Separately Managed Account Programs.** The Registrant may allocate (and/or recommend that the client allocate) a portion of a client's investment assets among unaffiliated Separately Managed Account programs, including but not limited to Envestnet, and in accordance with the client's designated investment objective(s). In such situations, the Separately Managed Account manager shall have day-to-day responsibility for the active discretionary management of the allocated assets. The Registrant shall continue to render investment advisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors which the Registrant shall consider in recommending Separately Managed Account programs include the client's designated investment objective(s). The Registrant will also consider each manager's management style, performance, reputation, financial strength, reporting capabilities, pricing, and research.

**Sub-Advisory Arrangements.** Registrant may engage sub-advisors for the purpose of assisting Registrant with the management of its client accounts, including but not limited to Envestnet, Strategy Asset Managers, 55I LLC, and The Pacific Financial Group. The sub-advisor(s) shall have discretionary authority for the day-to-day management of the assets that are allocated to it by Registrant. The sub-advisor shall continue in such capacity until such arrangement is terminated or modified by Registrant. Sub-advisors may be replaced and/or added at the discretion of the Registrant without prior notice to the client.

Registrant shall pay a portion of the investment advisory fee received for these allocated assets to the sub-advisor for its sub-advisory services. Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions concerning Registrant's sub-advisory arrangements.

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

- C. Registrant shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, Registrant shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on Registrant's services.
- D. **Wrap/Managed Account programs:** In the event that Registrant is engaged to provide investment management services as part of an unaffiliated wrap-fee program, Registrant will be unable to negotiate commissions and/or transaction costs. Under a wrap program, the wrap program sponsor arranges for the investor participant to receive 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 participant more or less than purchasing such services separately. In the event that Registrant is engaged to provide investment management services as part of an unaffiliated managed account program, Registrant will likewise be unable to negotiate commissions and/or transaction costs. If the program is offered on a non-wrap basis, the program sponsor will determine the broker-dealer through which transactions must be effected, and the amount of transaction fees and/or commissions to be charged to the participant investor accounts. Since the custodian/broker-dealer is determined by the program's sponsor, Registrant will be unable to negotiate commissions or transaction costs. As a result, clients 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 through alternative clearing arrangements recommended by Registrant. Higher transaction costs adversely impact account performance. Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client may have regarding participation in a wrap fee program.
- E. As of December 31, 2022, Registrant had \$273,058,882 in assets under management on a discretionary basis.

## Item 5 Fees and Compensation

A.

### INVESTMENT ADVISORY SERVICES

The fee schedule for our investment advisory services as of April 1, 2023 is as follows:

#### EQUITY, BOND AND BALANCED PORTFOLIOS (stock and bond)

<u>Account Market Value</u>	<u>Annual Fee as a % of Market Value</u>
\$0 - \$1,000,000	1.00%
\$1,000,000 - \$3,000,000	0.75%
\$3,000,000 - \$5,000,000	0.50%
\$5,000,000+	Negotiable

#### FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent specifically requested by a client, Registrant *may* determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. Registrant's planning and consulting fees are negotiable, but generally range from \$3,000 to \$20,000 on an annual fixed fee basis, and between \$350 to \$395 on an hourly rate basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

#### Information About Fees in General

The Registrant's fee is negotiable, and it may agree to reduce, waive or charge clients alternative fee arrangements. These negotiations and decisions are driven by various objective and subjective factors, including the representative assigned to the account, the amount of assets to be invested, the complexity of the engagement, the anticipated number of meetings and servicing needs of the client, related accounts, future earning capacity, and anticipated future additional assets. As a result, similar clients could pay different fees, which will affect a client's net account performance. Moreover, the services to be provided by the Registrant to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly. Upon request and with our written approval, accounts that have a family or business relationship and are subject to our standard Equity, Bond and Balanced Portfolios fee schedule are generally aggregated with each other for purposes of calculating the applicable fee.

Since the inception of our business, we have had other fee schedules in effect, which may provide for fees lower or higher than those shown above. Therefore, some of our clients pay higher or lower fees than our current standard fee schedules. From time to time, we negotiate fee schedules and minimum fees that vary from those discussed above. Additionally, the Registrant may provide investment advisory services to certain of its principals, employees, and their family members and friends without charge, or for fee rates that are lower than the rates available to other clients.

- B. Clients may elect to have Registrant's advisory fees deducted from their custodial account. Both Registrant's *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of Registrant's investment advisory fee and to directly remit that management fee to Registrant in compliance with regulatory procedures. In the limited event that Registrant bills the client directly, payment is due upon receipt of Registrant's invoice. Registrant shall deduct fees and/or bill clients quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, Registrant shall generally recommend that National Financial Services LLC and Fidelity Brokerage Services LLC (collectively "*Fidelity*") and TD Ameritrade ("*TD*") serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Fidelity* and *TD* charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). From time to time, the Registrant and its employees may recommend that certain clients enter into asset-based pricing arrangements with a custodian. In those instances, the client would not pay for the cost of each transaction, but would instead pay an asset-based fee designed to cover the cost of transactions. The Registrant only recommends them for accounts it expects to trade frequently, where it has a reasonable belief that the asset-based fee will be more favorable than paying transaction costs separately. The Registrant is not required to recommend or make this arrangement available to every client. The Registrant periodically reviews these arrangements, but it will not recommend that the client change their pricing arrangement, unless it determines that the benefit to the client will outweigh the administrative cost of changing the account relationship. In addition, there is no guarantee that a client will save fees and expenses by entering into this arrangement.

Clients entering into an asset-based pricing arrangement will still incur a "trade away" fee for each trade that the Registrant has executed by a different broker-dealer than a client's account's custodian. Because of this, in order to minimize clients' trading costs, we generally execute most trades for your account with the custodian of client's accounts.

In addition to Registrant's investment management fee, brokerage commissions, transaction fees, and custodial costs, clients will also incur expenses as shareholders or investors in mutual funds, exchange traded funds and private funds (e.g. management fees and other fund expenses).

- D. Registrant's annual investment advisory fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. When calculating the client's fee, the Registrant includes receivables outstanding as part of the market value of a client's assets, and the applicable fee paid to the Registrant will likely be higher as a result.

The *Investment Advisory Agreement* between Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, Registrant shall refund a prorated portion of any advanced advisory fee paid based upon the number of days remaining in the billing quarter.



## **Item 6            Performance-Based Fees and Side-by-Side Management**

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

## **Item 7            Types of Clients**

Registrant's clients generally include individuals, pension & profit sharing plans, and charitable organizations, although the Registrant has various different types of clients.

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

A. Registrant may utilize the following methods of security analysis:

- Fundamental - analysis performed on historical and present data, with the goal of making financial forecasts
- Technical – analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices
- Cyclical – analysis performed on historical relationships between price and market trends, to forecast the direction of prices

Registrant may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

**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 Registrant) will be profitable or equal any specific performance level(s).

Registrant's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis, Registrant must have access to current/new market information. Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of Registrant's 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.

Registrant's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short-term investment strategy and substantially higher transaction costs than a longer-term investment strategy.

- B. Currently, Registrant primarily allocates (or recommends that the client allocate) client investment assets among various individual equity (stocks), debt (bonds), mutual funds, real estate investment trusts, private placements, options and/or exchange traded funds, on a discretionary basis, and among independent managers, on a non-discretionary basis, in accordance with the client's designated investment objective(s).

## **Item 9           Disciplinary Information**

Registrant has not been the subject of any disciplinary actions.

## **Item 10          Other Financial Industry Activities and Affiliations**

- A. **Accounting Firm.** Registrant's Representatives are employed by Lane Gorman Trubitt, LLC ("*LGT*"). Certain of Registrant's representatives are Certified Financial Planners. Specifically, to the extent that *LGT* provides accounting services to any clients, including clients of Registrant, all such services shall be performed by *LGT*, independent of Registrant, for which services Registrant shall not receive any portion of the fees charged by *LGT*, referral or otherwise. *LGT* is not involved in providing investment advice on behalf of Registrant, nor does *LGT* hold itself out as providing advisory services on behalf of Registrant. No client of Registrant is under any obligation to use the accounting services of *LGT*. Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

**Licensed Insurance Agency/Agents.** *LGT Insurance Services, Inc.* is an affiliated licensed insurance company. Also, certain of Registrant's representatives, in their individual capacities, are licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. As referenced in Item 4.B above, clients can engage certain of Registrant's representatives to effect insurance transactions on a commission basis.

The recommendation by the Registrant or certain of its representatives that a client purchase an insurance commission product 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 commission products from Registrant's representatives. Clients are reminded that they may purchase insurance products recommended by Registrant through other, non-affiliated insurance agencies and/or insurance agents. Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

- B. The Registrant does not receive, directly or indirectly, compensation from investment advisers that it recommends or selects for its clients.

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

- A. Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant'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, Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Registrant or any person associated with Registrant.

- B. Neither Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which Registrant or any related person of Registrant has a material financial interest, except as disclosed above in Items 4 and 5 with respect to investments in unaffiliated investment funds.
- C. Registrant and/or representatives of Registrant *may* buy or sell securities that are also recommended to clients. This practice may create a situation where Registrant and/or representatives of the Registrant 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 Registrant 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 Registrant's clients) and other potentially abusive practices.

Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Registrant's "Access Persons". Registrant's securities transaction policy requires that an Access Person of Registrant 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. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date Registrant selects.

- D. Registrant and/or representatives of Registrant *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Registrant and/or representatives of the Registrant 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 in Item 11.C, Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons.

## **Item 12            Brokerage Practices**

- A. In the event that the client requests that Registrant recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at *Fidelity* or *TD*. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Registrant considers in recommending *Fidelity* or *TD* (or any other broker-dealer/custodian to clients) include historical relationship with Registrant, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Registrant's clients shall comply with Registrant's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Registrant determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. 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 Registrant 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, Registrant's investment management fee. Registrant's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. 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, Registrant may receive from *Fidelity* or *TD* (or another broker-dealer/custodian, investment platform, unaffiliated investment manager, mutual fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Registrant to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Registrant 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, computer hardware and/or software and/or other products used by Registrant 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 Registrant in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Registrant to manage and further develop its business enterprise.

Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *Fidelity* or *TD* as a result of this arrangement. There is no corresponding commitment made by Registrant to *Fidelity*, *TD* 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.

2. Registrant does not receive referrals from broker-dealers.
3. Registrant 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 Registrant 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

Registrant. As a result, 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.

In the event that the client directs Registrant 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 Registrant. 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.

Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above arrangement.

- B. To the extent that Registrant provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless Registrant decides to purchase or sell the same securities for several clients at approximately the same time. Registrant may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Registrant's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Registrant shall not receive any additional compensation or remuneration as a result of such aggregation.

### **Item 13      Review of Accounts**

- A. For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on an ongoing basis by Registrant's Principals and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise Registrant of any changes in their investment objectives and/or financial situation. All clients (either in person, by telephone, or virtually) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with Registrant on an annual basis.
- B. Registrant may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. 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. Upon request, the Registrant will provide a written periodic report summarizing account activity and performance.

## **Item 14            Client Referrals and Other Compensation**

- A. Registrant, without cost (and/or at a discount), receives support services and/or products from *Fidelity* and/or *TD*.

Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *Fidelity* and/or *TD* as a result of this arrangement. There is no corresponding commitment made by Registrant to *Fidelity*, *TD*, or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products because of the above arrangement. Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above arrangement and the conflict of interest such arrangement creates.

- B. Registrant does not compensate, directly or indirectly, any person, other than its representatives, for client referrals.

## **Item 15            Custody**

Registrant shall have the ability to have its advisory fee for each client debited by the custodian. 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. Upon request, the Registrant will provide a written periodic report summarizing account activity and performance.

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

The Registrant is also deemed to have custody under the Investment Advisers Act of 1940 that requires disclosure in Item 9 of Part 1A of Form ADV and also subjects those accounts for which the Registrant is deemed to have custody to an annual examination by an independent public accountant. The Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding custody-related issues.

## **Item 16            Investment Discretion**

The client can determine to engage Registrant to provide investment advisory services on a discretionary basis. Prior to Registrant assuming discretionary authority over a client's account, client shall be required to execute an *Investment Advisory Agreement*, naming Registrant as client's attorney and agent in fact, granting Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage Registrant on a discretionary basis may, at any time, impose restrictions, in writing, on Registrant's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe Registrant's use of margin, etc.).

**Item 17          Voting Client Securities**

- A. Registrant does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Registrant to discuss any questions they may have with a particular solicitation.

**Item 18          Financial Information**

- A. Registrant is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- B. Registrant has not been the subject of a bankruptcy petition.

**ANY QUESTIONS: Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**

## Item 1 Cover Page

A.

**William Walsh**

LGT Financial Advisors LLC

Brochure Supplement

Dated: March 29, 2023

Contact: Michael S. Radoff, Chief Compliance Officer  
2626 Howell Street, Suite 700  
Dallas, Texas 75204

B.

**This brochure supplement provides information about William Walsh that supplements the LGT Financial Advisors LLC brochure; you should have received a copy of that brochure. Please contact Michael S. Radoff, Chief Compliance Officer if you did *not* receive LGT Financial Advisors LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about William Walsh is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Education Background and Business Experience

William Walsh was born in 1955. Mr. Walsh graduated from Texas Tech University in 1978, with a Bachelor of Business Administration degree in Accounting. Mr. Walsh has been an investment adviser representative of LGT Financial Advisors LLC since May, 2001 and was the Managing Member until January, 2016. Mr. Walsh was a registered representative of Investment Security Corporation from November, 2012 to January, 2022 and a Partner of Lane Gorman Trubitt LLC from September, 1987 to December, 2020. From July, 2015 to June, 2018 Mr. Walsh was an investment adviser representative of Lido Advisors, LLC.

Mr. Walsh held the designation of Certified Public Accountant ("CPA") from August 1980 until his retirement in December 2022. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum



experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

In addition to the Code of Professional Conduct, AICPA members who provide personal financial planning services are required to follow the Statement on Standards in Personal Financial Planning Services (SSPFPS).

Mr. Walsh had been designated as a Personal Financial Specialist ("PFS") from January 2011 until his retirement in December, 2022. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, certificate, or permit, none of which are in inactive status; fulfill 3,000 hours of personal financial planning business experience; complete 75 hours of personal financial planning CPE credits; pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and the Statement on Standards in Personal Financial Planning Services, when providing personal financial planning services. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

### **Item 3 Disciplinary Information**

None.

### **Item 4 Other Business Activities**

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

## **Item 5 Additional Compensation**

None.

## **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Michael S. Radoff, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Radoff at (214) 461-1539.

## Item 1 Cover Page

A.

**Michael S. Radoff**

LGT Financial Advisors LLC

Brochure Supplement

Dated: March 29, 2023

Contact: Michael S. Radoff, Chief Compliance Officer  
2626 Howell Street, Suite 700  
Dallas, Texas 75204

B.

**This brochure supplement provides information about Michael S. Radoff that supplements the LGT Financial Advisors LLC brochure; you should have received a copy of that brochure. Please contact Michael S. Radoff, Chief Compliance Officer if you did *not* receive LGT Financial Advisors LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Michael S. Radoff is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Education Background and Business Experience

Michael S. Radoff was born in 1954. Mr. Radoff graduated from University of Texas, Austin in 1978, with a Bachelor of Business Administration degree in Accounting. Mr. Radoff has been an Advisory Representative of LGT Financial Advisors LLC since May, 2005 and was a Member until 2016. From March, 2009 to December, 2019, Mr. Radoff was a licensed insurance agent of LGT Insurance Services Inc. From November, 2012 to December of 2019, Mr. Radoff was a registered representative of Investment Security Corporation. From January, 1989 to December, 2019, Mr. Radoff was a Partner of Lane Gorman Trubitt LLC.

Mr. Radoff has held the designation of Certified Public Accountant ("CPA") since January 1981. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states

require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

In addition to the Code of Professional Conduct, AICPA members who provide personal financial planning services are required to follow the Statement on Standards in Personal Financial Planning Services (SSPFPS).

### **Item 3 Disciplinary Information**

None.

### **Item 4 Other Business Activities**

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

### **Item 5 Additional Compensation**

None.

### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Michael S. Radoff, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the

Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Radoff at (214) 461-1539.

## Item 1 Cover Page

A.

### **Richard Trubitt**

LGT Financial Advisors LLC

Brochure Supplement

Dated: March 29, 2023

Contact: Michael S. Radoff, Chief Compliance Officer  
2626 Howell Street, Suite 700  
Dallas, Texas 75204

B.

**This brochure supplement provides information about Richard Trubitt that supplements the LGT Financial Advisors LLC brochure; you should have received a copy of that brochure. Please contact Michael S. Radoff, Chief Compliance Officer if you did *not* receive LGT Financial Advisors LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Richard Trubitt is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Education Background and Business Experience**

Richard Trubitt was born in 1955. Mr. Trubitt graduated from University of Texas, Austin in 1976, with a Bachelor of Business Administration degree in Accounting. Mr. Trubitt has been an Advisory Representative of LGT Financial Advisors LLC since January, 2001 and was a Member until 2016. From January, 1985 to December, 2020, Mr. Trubitt was a Partner of Lane Gorman Trubitt LLC.

Mr. Trubitt has held the designation of Certified Public Accountant ("CPA") since January, 1980. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the

Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

In addition to the Code of Professional Conduct, AICPA members who provide personal financial planning services are required to follow the Statement on Standards in Personal Financial Planning Services (SSPFPS).

### **Item 3 Disciplinary Information**

None.

### **Item 4 Other Business Activities**

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

### **Item 5 Additional Compensation**

None.

### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Michael S. Radoff, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Radoff at (214) 461-1539.

**Item 1 Cover Page**

A.

**Jeffrey Miller Bentley**

LGT Financial Advisors LLC

ADV Part 2B, Brochure  
Supplement Dated: March 29, 2023

Contact: Michael S. Radoff, Chief Compliance Officer  
2626 Howell Street, Suite 700  
Dallas, Texas 75204

B.

**This Brochure Supplement provides information about Jeffrey Miller Bentley that supplements the LGT Financial Advisors LLC Brochure; you should have received a copy of that Brochure. Please contact Michael S. Radoff, Chief Compliance Officer, if you did *not* receive LGT Financial Advisors LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jeffrey Miller Bentley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

**Item 2 Education Background and Business Experience**

Jeffrey Miller Bentley was born in 1992. Mr. Bentley graduated from the University of Arkansas in 2015, with a Bachelor's degree in Agriculture, Food & Life Sciences. Mr. Bentley has been employed as a financial advisor of LGT Financial Advisors LLC since August, 2019. Mr. Bentley was a registered representative of Investment Security Corporation from November, 2019 to January, 2023. From June, 2016 to July, 2019, Mr. Bentley was employed as a financial representative of Fidelity Brokerage Services LLC; from June, 2015 to May, 2016, Mr. Bentley was employed as an assistant-in-training of The Alotian Club; and from July, 2011 to May, 2015, Mr. Bentley was a student of the University of Arkansas.



### Item 3 Disciplinary Information

None.

### Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. **Licensed Insurance Agent.** Mr. Bentley, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Bentley to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Bentley that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Bentley. Clients are reminded that they may purchase insurance products recommended by Mr. Bentley through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Michael S. Radoff, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

### Item 5 Additional Compensation

None.

### Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Michael S. Radoff, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Radoff at (214) 461-1539.

## Item 1 Cover Page

A.

**Alisha Zianne Reilly, CFP®**

LGT Financial Advisors LLC

Brochure Supplement

Dated: March 29, 2023

Contact: Michael S. Radoff, Chief Compliance Officer  
2626 Howell Street, Suite 700  
Dallas, Texas 75204

B.

**This brochure supplement provides information about Alisha Zianne Reilly that supplements the LGT Financial Advisors LLC brochure; you should have received a copy of that brochure. Please contact Michael S. Radoff, Chief Compliance Officer if you did *not* receive LGT Financial Advisors LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Alisha Zianne Reilly is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Education Background and Business Experience

Alisha Zianne Reilly was born in 1980. Mrs. Reilly graduated from Queen's University in 2004, with a Bachelor of Art degree in Psychology. Mrs. Reilly served as an investment advisor representative of LGT Financial Advisors LLC from January, 2013 until June, 2018. Mrs. Reilly has also served as a registered representative of Investment Security Corporation from November, 2012 until June, 2018. Mrs. Reilly has also served as an investment adviser representative at Lido Advisors, Inc. from March, 2013 until June, 2018 and an administrator of Lane Gorman Trubitt LLC from March, 2010 until June, 2018. In July, 2011 Mrs. Reilly became a licensed insurance agent at LGT Insurance Services Inc.

Ms. Reilly has been a CERTIFIED FINANCIAL PLANNER™ since June, 2015. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 Disciplinary Information**

None.

### **Item 4 Other Business Activities**

- C. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- D. The supervised person is not substantially involved in any non-investment related business activities.

### **Item 5 Additional Compensation**

None.

### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Michael S. Radoff, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Radoff at (214) 461-1539.