

Centric Advisors, LLC

Firm Brochure - Form ADV

Part 2A

This brochure provides information about the qualifications and business practices of Centric Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (888) 215-5888 or by email at: info@centric.org. 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 Centric Advisors, LLC. is also available on the SEC's website at www.adviserinfo.sec.gov. Centric Advisors, LLC's CRD number is: 282477.

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Registration does not imply a certain level of skill or training.

Version date - August 2023

Item 2: Material Changes

The material changes in this brochure from the last updating amendment of Centric Advisors, LLC in February 2023 are described below. Material changes relate to Centric Advisors, LLC policies, practices or conflicts of interests only.

The firms new address is:

12549 Louetta Road

Cypress, TX 77429

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Item 4: Advisory Business

A. Description of the Advisory Firm

Centric Advisors, LLC, formerly Majors & Mondragon, LLC (hereinafter “Centric”) is a Limited Liability Company organized in the State of Texas.

The firm was formed in November 2015, and the principal owners are Zachary Thomas Majors and Oscar Raul Mondragon.

B. Types of Advisory Services

Portfolio Management Services

Centric offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Portfolio management services include, but are not limited to, the following:

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

Centric evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. A long-term investment plan is established, then reconfirmed or adjusted at least annually. Centric will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

Centric seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Centric’s economic, investment or other financial interests. To meet its fiduciary obligations, Centric attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Centric’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Centric’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Financial Planning

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt /credit planning.

Services Limited to Specific Types of Investments

Centric generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and commodities. Centric may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Centric offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Centric from properly servicing the client account, or if the restrictions would require Centric to deviate from its standard suite of services, Centric reserves the right to end the relationship.

D. Wrap Fee Programs

Centric does not participate in wrap fee programs.

E. Assets Under Management

Centric has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$126,877,328	\$23,747,403	12/31/2022

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

Centric will manage assets for a negotiated advisory fee between 0.25% - 2.50% for investment advisory services. Cash is considered to be an asset class and as a result, is included in the calculation of fees. Clients are billed monthly. Clients will have the option to make payment by electronic bank transfer or withdrawn directly from client's account. Clients in Vermont will never be charged in excess of 2.00%.

Fees are generally negotiable, and the final fee schedule is attached as Exhibit I of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of Centric's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 14 days' written notice.

Centric uses end of month account value in the client's account throughout the billing period, after taking into account deposits, for purposes of determining the market value of the assets upon which the advisory fee is based.

There are times when a margin account is used to purchase securities for clients. Using margin is not suitable for all investors. Please refer to Item 8 below for additional information on the risks associated with margin accounts.

Financial Planning Fees

The following are the fees charged by Centric Advisors, LLC for services provided:

Comprehensive Financial Planning

Comprehensive Financial Planning consists of an upfront charge of \$250 to \$20,000 and an ongoing fee that is paid monthly, or annually, in advance, at the rate of \$99 to \$10,000 per month to assist you with the plan's execution and to monitor your progress. The fee may be negotiable in certain cases. This service may be terminated with 30 days' notice. Upon termination of services, the fee will be prorated, and any unearned fee will be refunded to the client.

Basic Financial Planning Fee

Basic Financial Planning will generally be offered on a fixed fee basis. In special circumstances, it may be offered on an hourly basis at a rate of \$ 100 to \$ 500 per hour, depending on the nature of the specified services. Fixed fees will be determined on a case by case basis with the fee based on the complexity of the situation and the needs of the client. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$ 250 - \$10,000. The fee is negotiable. If a fixed fee program is chosen, half of the fee is due at the beginning of process and the remainder is due at completion of work, however, Centric will not bill an amount above \$500.00 more than 6 months in advance.

Clients may terminate the agreement without penalty for a full refund of Centric's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon 30 days written notice.

Hourly Fees

The negotiated hourly fee for these services is between \$150 and \$500. Fees are charged 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in advance.

For fees deducted directly from client accounts, in states that require it, Centric will:

- (A) possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Payment of Financial Planning Fees

Financial planning fees are paid via check and wire.

Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Hourly financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

C. Client Responsibility For Third Party Fees

Clients are still responsible for all other account fees, including but not limited to annual IRA fees to the custodian, transition fees if the account is moved to another broker, or mutual fund fees. Please refer to Item 12 of this brochure.

D. Prepayment of Fees

Centric collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Outside Compensation For the Sale of Securities to Clients

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

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

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

Item 7: Types of Clients

Centric generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations
- ❖ Charitable Organizations

Minimum Account Size for Portfolio Management

There is no account minimum.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Centric's methods of analysis include fundamental analysis, technical analysis and cyclical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

Centric uses long term trading, short term trading, short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Investment Strategies

Centric's use of short sales, margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Centric's use of short sales, margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Use of Margin: There are times when a margin account is used to purchase securities for clients. Using margin is not suitable for all investors: the use of margin increases leverage in a client's account and therefore increases overall risk. In addition, clients with margin accounts will be charged margin interest by the brokerage firm on the debit balance in their account.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

Centric does not have criminal or civil actions to report.

B. Administrative Proceedings

Centric does not have administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

Centric does not have self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Centric nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Centric nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Centric Risk Strategies, LLC, an Insurance Agency, is owned by Zachary Majors and Oscar Mondragon. In addition, Investment Advisory Representatives are independent licensed insurance agents, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Centric always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Centric in connection with such individual's activities outside of Centric.

Richard Vernon Cull is an investment adviser representative with another firm. From time to time, he will offer clients advice or products from this activity. Centric Advisors, LLC always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Centric Advisors, LLC in such individuals outside capacity.

Richard Vernon Cull is a Senior Portfolio Manager for Breen Investors LP. He does research individual stocks and make recommendations to the Chief Investment officer.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Centric does not utilize nor select third-party investment advisers. All assets are managed by Centric management.

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

A. Code of Ethics

Centric has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Centric's Code of Ethics is available free upon request to any client or prospective client. Representatives of Centric are required to follow and adhere to our Code of Ethics.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Centric may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Centric to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Centric will always

document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

From time to time, representatives of Centric may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Centric to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Centric will never engage in trading that operates to the client's disadvantage if representatives of Centric buy or sell securities at or around the same time as clients. All representatives will abide by the Code of Ethics.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Centric's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Centric may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Centric's research efforts. Centric will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Centric recommends Charles Schwab and Fidelity Brokerage Services LLC.

1. Research and Other Soft Dollar Benefits

While Centric has no formal soft dollar program in which soft dollars are used to pay for third party services, Centric may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Centric may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Centric does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Centric benefits by not having to produce or pay for the research, products or services, and Centric will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be

aware that Centric's acceptance of soft dollar benefits may result in higher commissions charged to the client.

Centric participates in the advisory programs (the "Program") offered by Fidelity Brokerage Services, and or Charles Schwab. Fidelity Brokerage Services, and or Charles Schwab offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Centric receives some benefits from Fidelity Brokerage Services, and or Charles Schwab through its participation in the Program.

There is no direct link between Centric's participation in the Program and the investment advice it gives to its clients, although Centric receives economic benefits through its participation in the Program that are typically not available to Fidelity Brokerage Services, and or Charles Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Centric participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have Centric's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Centric by third party vendors. Fidelity Brokerage Services, and or Charles Schwab may also pay for business consulting and professional services received by Centric's related persons. Some of the products and services made available by Fidelity Brokerage Services, and or Charles Schwab through the Program may benefit Centric but may not benefit its client accounts. These products or services may assist Centric in managing and administering client accounts, including accounts not maintained at Fidelity Brokerage Services, and or Charles Schwab. Other services made available by Fidelity Brokerage Services, and or Charles Schwab are intended to help Centric manage and further develop its business enterprise. The benefits received by Centric or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to Fidelity Brokerage Services, and or Charles Schwab. As part of its fiduciary duties to clients, Centric endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Centric or its related persons in and of itself creates a conflict of interest and may indirectly influence the Centric's choice of Fidelity Brokerage Services, and or Charles Schwab for custody and brokerage services.

2. Brokerage for Client Referrals

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

3. Clients Directing Which Broker/Dealer/Custodian to Use

Centric may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to Centric to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless Centric is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Centric buys or sells the same securities on behalf of more than one client located at the same custodian, then Centric may (but is not required to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Centric would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. In making this determination, Centric will consider a number of factors, including, but not limited to: the client's investment objectives, investment guidelines, liquidity requirements, legal or regulatory restrictions, tax considerations, and the nature and size of the block trade order.

Clients may instruct us to direct all or a portion of the securities transactions for its account to a specified broker, dealer or custodian. The client who directs us to use a specific broker or custodian may pay higher or lower transaction fees and may receive less or more favorable execution services than if the client did not direct transactions to a particular broker or custodian. Because client-directed trades often cannot be aggregated with non-directed trades, such designations may adversely affect Centric's ability to obtain volume discounts on aggregated orders or to obtain best price and execution by effecting certain transactions directly with the market maker.

The securities we trade are highly liquid, therefore the conflict of interest is minimal. To mitigate this conflict, Centric performs periodic reviews of Client trade execution with the applicable custodians and brokerage services provided, mitigates that conflict of interest through disclosures made in this Brochure, client agreements, and in conversations with clients.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Centric's advisory services provided on an ongoing basis are reviewed at least annually by Zac Majors, Chief Executive Officer, and Richard Cull, Chief Investment Officer with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Zac Majors, Chief Executive Officer. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Centric's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Centric's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion; there are no reports beyond the written financial plan.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than the benefits discussed in Item 12 above, Centric does not receive any economic benefit directly or indirectly from any third party for advice rendered to its clients. There is no direct link between Centric's participation in the Fidelity Brokerage Services, and or Charles Schwab Programs and the investment advice it gives to its clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

Centric may, via written arrangement, retain third parties to act as solicitors for Centric's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. Centric will ensure each solicitor is properly registered in all appropriate jurisdictions.

Centric's current solicitor arrangement ranges from 5% to 50% of the advisory fee received by client. Compensation for such referrals is agreed upon in writing, and disclosures are made to the respective clients.

Item 15: Custody

Centric does not accept or permit its associated persons from obtaining custody of client assets. When advisory fees are deducted directly from client accounts at client's custodian, Centric will be deemed to have limited custody of client's assets. A surprise examination is not required because Centric has written authorization from each client to deduct advisory fees from the account held with the qualified custodian and each time a fee is directly deducted from a client account, Centric sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account.

Clients will receive all account statements as required from their respective custodian(s) at least quarterly, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Centric provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Centric generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Clients with discretionary accounts will execute a limited power of attorney to evidence discretionary authority. Clients may, but typically do not, impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

Centric neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither Centric nor its management has any financial condition that is likely to reasonably impair Centric's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Centric has not been the subject of a bankruptcy petition in the last ten years.

D. DOL Disclosure

When Centric provides investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.