

**ITEM 1: COVER PAGE**

# **GEOMETRIC WEALTH ADVISORS, LLC**

ARLINGTON HEIGHTS, IL  
DENVER, CO  
MINNEAPOLIS, MN  
NEW YORK, NY  
VIENNA, VA  
WASHINGTON, DC  
WWW.GEOMETRICADVISORS.COM

ADV Part 2A  
Chief Compliance Officer: Patrick S. McGough

December 1, 2023

*This brochure provides information about the qualifications and business practices of Geometric Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact Geometric at (847) 873-9580. 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. Geometric Wealth Advisors, LLC is a registered investment advisor. Registration does not imply any certain level of skill or training. Additional information about Geometric Wealth Advisors, LLC (CRD # 171670) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **ITEM 2: MATERIAL CHANGES**

This item discusses material changes from the previous amendment of our brochure dated June 1, 2023. Since last update there are no material changes to report.

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## **ITEM 4: ADVISORY BUSINESS**

Geometric Wealth Advisors, LLC (“Geometric”) is a Limited Liability Company formed under the laws of the State of Delaware. Geometric has been in business since January of 2015, and is owned and managed by Andrew S. Leonard and Thomas W. McAndrews. Patrick S. McGough is the Chief Compliance Officer.

Geometric provides personalized wealth management services to individuals, families and trusts. Wealth management includes both investment management and financial planning services, as described below.

### **Investment Management**

Geometric creates an individualized investment plan for each client. The plan will be specific to each client’s unique life situation, financial goals, investment objectives, time frame for investing, tolerance for risk, and other factors.

Geometric does not have a minimum account size for investment management services – the firm considers all potential clients on a case-by-case basis to determine appropriateness, and in some instances charges a minimum fee (see Item 5).

Investment management services will be provided on a discretionary basis. Accordingly, Geometric will be authorized to perform various functions, on the client's behalf, without further approval from the client. Such functions will include the determination of the type and/or amount of securities to be purchased or sold. As part of the Wealth Management Agreement that details the responsibilities of both parties, clients will be asked to execute a Limited Power of Attorney granting Geometric discretionary authority over the client’s accounts.

Clients may at any time place restrictions on the types of investments that Geometric may use in their accounts, or on the allocations to each security type. Such restrictions must be provided in writing.

### **Financial Planning**

Geometric will advise clients on all matters of financial planning, including but not limited to tax planning, saving for retirement, saving for college, debt management, financing of large purchases, estate planning, and charitable giving.

All advice will be specific to each client’s unique situation, and will be based on information provided by the client through meetings, conversations, and the sharing of documents. It is important that clients continually update Geometric with any changes in their lives that might affect the advice given or the plan that is already in place.

Certain financial planning issues require deeper subject matter expertise than Geometric can provide, or require specific services that can only be provided by licensed professionals. In those instances, Geometric may provide referrals to outside professionals such as accountants, estate attorneys, or insurance brokers. Geometric will not accept any form of monetary compensation from outside professionals for those referrals.

Clients should be aware that conflicts may exist between Geometric's interest and those of our clients receiving financial planning advice, in that Geometric could provide recommendations that result in outcomes that create additional wealth management fees. Clients are under no obligation to act upon our recommendation, and if the client elects to act on any recommendation, the client is under no obligation to effect the transaction through Geometric.

### **Tax and Estate Planning Services**

As part of its investment management and financial planning services, Geometric will also generally provide tax and estate planning services through its duly-licensed and qualified personnel. Tax services include tax return preparation, tax planning/consulting, quarterly voucher preparation, and tax notice assistance/representation. Estate planning services include a periodic review of a client's estate plan, estate plan organization, and asset titling and beneficiary designation confirmations. Importantly, clients should be aware that Geometric is not a law firm and none of its personnel render any legal services, and as such clients should not construe Geometric or its personnel as their legal counsel.

Clients should refer to their specific wealth management agreement for the agreed-upon tax and estate planning services to be rendered, as well as for important exclusions for what is explicitly *not* provided as part of such services.

If a client requests, Geometric may recommend the services of other professionals for implementation purposes. Clients are under no obligation to engage the services of any such recommended professional. Clients retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from Geometric. If clients engage any professional recommended by Geometric, and a dispute arises thereafter relative to such engagement, clients agree to seek recourse exclusively from and against the engaged professional.

### **Wrap Fee Program**

Geometric does not offer participation in a wrap fee program.

### **Assets under Management**

As of December 1, 2023 Geometric has \$679,667,000 of assets under management across 1,542 accounts for 197 client households, all of which are managed on a discretionary basis.

## **ITEM 5: FEES AND COMPENSATION**

### **A. Fees Charged**

Geometric's fee schedule is as follows:

	<b>Annual Rate</b>
For assets under management up to \$2.5 million	1.00%
For amounts between \$2.5 and \$5 million	0.75%
For amounts between \$5 and \$10 million	0.50%

For amounts above \$10 million	0.25%
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For example, a client with \$3 million under Geometric’s management would pay 1.00% per year on the first \$2.5 million under management (\$25,000) and 0.75% per year for amounts between \$2.5 million and \$3 million (\$3,750) for a total of \$28,750 (or a blended rate of 0.96%) per year.

Geometric does not have a minimum portfolio size but may institute a minimum annual fee based on each client’s circumstances. At its discretion, Geometric may set the minimum fee based on a number of factors, which include but are not limited to the client’s anticipated future additional assets or the client’s relationship with an existing client.

Geometric’s standard fee schedule may be negotiable at the firm’s discretion, and clients may pay a higher or lower fee than the standard schedule based on a number of factors, which include but are not limited to “grandfathered” clients with previously-agreed-upon fee arrangements, the size and/or complexity of client’s accounts and financial needs, and other special situations. Geometric does not charge separately for financial planning, tax, or estate planning services.

Please note that the same or similar services may be available for a higher or lower cost, especially for those with smaller accounts, from other wealth management firms.

## **B. Fee Payment**

Wealth management fees will generally be debited directly from each client’s account held by a qualified custodian. Clients whose fees are directly debited will provide written authorization for Geometric to do so.

Wealth management fees are paid quarterly, in advance, and the value used for the fee calculation is the net asset values as of the last market day of the previous quarter. This means that if the client’s annual fee is 1.00%, then each quarter Geometric will multiply the combined value of the client’s accounts by 1.00% and divide by four to calculate the fee for that quarter. The value used to calculate Geometric’s fee includes any allocation to investable cash, which refers to cash in a client account intended for asset allocation, typically held in a money market fund. Once the calculation is made, Geometric will instruct the client’s custodian to deduct the fee from the client’s account and remit it to Geometric.

Each quarter, clients will receive an invoice itemizing the fees debited, including the formula used to calculate the fee, the amount of assets upon which the fee is based, and the time period covered by the fee. The client will also receive statements from their account custodian showing all transactions in their accounts, including any fees that were debited, but clients should note that the fee they pay is not independently calculated or confirmed by the custodian.

Please refer to Item 12, which discusses Brokerage Practices.

## **C. Other Fees**

Geometric’s fees do not include custodian fees. Any fees owed to the custodian, such as transaction fees, brokerage commissions, and/or other charges incurred in connection with transactions in accounts, are paid by the client directly from the assets in the account. These charges are in addition to the fees the client pays to Geometric.

In addition, any mutual fund shares held in a client's account may be subject to fund-related expenses. The fund's prospectus fully describes the fees and expenses. All fees paid to Geometric for wealth management services are separate and distinct from the fees and expenses charged by mutual funds. Consequently, clients with mutual funds in their portfolios are effectively paying both Geometric and the mutual fund manager for the management of their assets.

#### **D. Pro-Rata Fees**

Clients who join Geometric during a quarter will pay a pro-rated wealth management fee determined by the number of days remaining in that quarter.

Either party may terminate the Wealth Management Agreement at any time by providing written notice to the other party. Geometric will refund any prepaid, unearned wealth management fees. Geometric will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked," meaning they will no longer be visible to Geometric and will become a retail account with the custodian.

#### **E. Compensation for the Sale of Securities**

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

### **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

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

### **ITEM 7: TYPES OF CLIENTS**

Geometric provides investment management services to individuals, families, and trusts.

### **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

Geometric begins the investment process by meeting and/or speaking with the client – typically several times – in an attempt to understand the client's life situation, financial goals, investment objectives, time frame for investing, tolerance for risk, and other factors. Geometric uses that information to develop a unique investment plan for the client's investments. Geometric formalizes that plan in writing by creating an Investment Plan (IP), which is then presented to the client. The IP details the asset allocation strategy that Geometric will implement on behalf of the client, the investment philosophy that underlies that strategy, and the methodology that will be used to execute it. Only after both parties understand and agree upon the investment plan will Geometric begin to construct and manage a client's portfolio. Both parties will review the IP periodically and whenever necessary to ensure that it continues to match the client's evolving needs.

Geometric practices long-term investing, and avoids making short-term investment decisions based upon market fluctuations, forecasts, or news (be it financial, economic, or political).

Geometric believes that investors must diversify broadly, and should avoid making unnecessarily large bets on any one security, asset class, or geographic region.

Geometric invests primarily in “passive” mutual funds and exchanged-traded funds in an attempt to capture the returns of an entire asset class, rather than predict which securities within that asset class will outperform.

Geometric regularly monitors portfolios to ensure that each client’s allocation to every security or asset class remains within the acceptable ranges agreed upon in the client’s IP. When necessary, Geometric buys or sells securities to bring the portfolio back towards its targeted allocations.

Additionally, part of the Geometric process includes, where appropriate, involving multiple generations in order to facilitate family financial planning. This can increase the financial education of the later generations and manage expectations. However, potential for conflicts of interest exist with the exchange of intergenerational information. Geometric attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household’s consent.

Investing in securities, including mutual funds, always involves risk of loss which clients should expect to bear. Specifically, client portfolios are exposed to the following primary risks:

- **Market Risk** – Economic, political, and issuer-specific events may cause the value of securities to rise or fall.
- **Small Company Risk** – Securities of small companies are often less liquid than those of large companies. As a result, small company stocks may fluctuate relatively more in price.
- **Foreign Securities and Currencies Risks** – Foreign securities prices may decline or fluctuate because of economic or political actions of foreign governments, and/or because of less regulated or less liquid securities markets. Investors holding these securities are also exposed to foreign currency risk (the possibility that foreign currency may fluctuate in value against the U.S. dollar).
- **Emerging Markets Risk** – Numerous emerging market countries have experienced serious economic and political problems. Stock markets in many emerging market countries are relatively small, expensive to trade and risky. Foreigners are sometimes limited in their ability to invest in, and withdraw assets from, these markets.
- **Credit Risk** – The issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer’s credit rating or a perceived change in an issuer’s financial strength may affect a security’s value.
- **Interest Rate Risk** – The prices of fixed income securities tend to move in the opposite direction of interest rates. In general, fixed income securities with longer maturities are more sensitive to these price changes.
- **Income Risk** – The potential for a decline in a fund’s income due to falling interest rates.
- **Inflation Risk (also called Purchasing Power Risk)** – The cash flows from an investment may not be worth as much in the future because of changes in purchasing power due to inflation.
- **Tax Risks Related to Short Term Trading** – Geometric may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long-term strategies.



## **ITEM 9: DISCIPLINARY INFORMATION**

Geometric has no disciplinary items to report.

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. Broker-Dealer**

Neither the principal of Geometric nor any related persons are registered, or have an application pending to register, as a broker-dealer.

### **B. Futures Commission Merchant/Commodity Trading Advisor**

Neither the principal of Geometric nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

### **C. Relationship with Related Persons**

Geometric maintains a succession plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel due to disability or death. The details of the succession plan are outlined in the current operating agreement – amended and restated on January 25, 2022. Geometric can provide additional information to any current or potential client upon request to Andrew S. Leonard, Managing Partner, at (973) 525-4901 or aleonard@geometricadvisors.com. Upon execution of the succession plan, clients will be informed and given the option to choose to seek another advisor.

## **ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **A. Code of Ethics**

Geometric's code of ethics is built into the firm's Compliance Manual and is available upon request. Geometric's code of ethics includes discussions of the firm's fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

### **B. Material Financial Interest in Recommended Securities**

Geometric does not recommend to clients that they invest in any security in which Geometric or any principal thereof has any financial interest.

### **C. Investing in Same Securities as Recommended**

On occasion, an employee of Geometric may purchase for his or her own account securities which are also recommended for clients. Geometric's Compliance Manual details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all

employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

#### **D. Simultaneously Investing in Same Securities as Recommended**

Similar to the above, on occasion, an employee of Geometric may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Geometric's Compliance Manual details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

### **ITEM 12: BROKERAGE PRACTICES**

#### **Recommendation of Custodian/Broker-Dealer**

It is expected that most, if not all, transactions in a given client account will be cleared through the custodian of that account in its capacity as a broker-dealer.

Geometric recommends that investment accounts be held in custody by Charles Schwab Advisor Services, member FINRA/SIPC/NFA ("Schwab"), an unaffiliated SEC-registered broker-dealer. Schwab is wholly independent from Geometric. Schwab offers enhanced services to independent investment advisors, including custody of securities, trade execution platforms, and access to research not available to the general public.

Geometric recommends Schwab to its clients based on a variety of factors. These include, but are not limited to, transaction charges, including commission costs. Schwab offers what can be considered discounted transaction charges. Schwab has arrangements with many mutual funds that enable Geometric to purchase these mutual funds for client accounts at reduced transaction charges (when compared to other broker-dealers). However, in choosing a broker-dealer/custodian to recommend, Geometric is primarily concerned with the value that the client receives for the cost paid, and not simply the cost alone. Other determinants of overall value include financial stability, speed and accuracy of execution, quality of research, knowledge and experience of staff, reliability of service, and selection of mutual funds that can be purchased in client accounts.

Geometric re-evaluates the use of Schwab at least annually to determine if it still offers the best value for its clients.

Schwab provides Geometric with some non-cash benefits – which are not available to retail customers – in return for placing client assets with them or executing trades through them. Such non-cash benefits are referred to as "soft dollars." Soft dollars provide additional value and are accordingly considered in determining which broker-dealer or custodian to utilize as part of Geometric's best-execution analysis. All "soft dollar" benefits Geometric receives from Schwab are eligible research and brokerage services under section 28(e) of the Securities Exchange Act of 1934. Currently, these benefits come in the form

of practice management software and offers to attend sponsored investment seminars. These products, services, or educational seminars might play a role in determining how Geometric invests client accounts. If there is any item that has a multi-use aspect, mixed between investment and non-investment purposes, Geometric will determine a reasonable allocation of investment to non-investment use. Geometric receives a benefit from these services, as otherwise the firm might be compiling the same research on its own. This may cause a conflict of interest, as Geometric may want to place more client accounts with a broker-dealer/custodian such as Schwab, solely because of these added benefits. As such, Geometric may have an incentive to select or recommend a broker-dealer/custodian based on interests in receiving the research or other products or services, rather than on clients' interest in receiving the most favorable execution. Geometric attempts to mitigate this potential conflict by performing regular reviews of execution services and by ensuring that clients are receiving the best possible value for costs paid.

When considering the value provided by a broker-dealer/custodian, Geometric considers the benefit to all clients, as products and services received via soft dollars will generally be used for the benefit of all clients. However, it is possible that a given client's trades will generate soft dollars that acquire products and/or services that are not ultimately utilized for that same client's account.

Geometric does not consider whether Schwab, or any other broker-dealer/custodian, refers clients to Geometric as part of our evaluation.

Geometric does not require that clients maintain assets with a custodian recommended by Geometric. When a client requires that account transactions be effected through a specific broker-dealer or custodian, this is referred to as "directed brokerage" or managing "held away" assets. In such instances where assets are "held away" from Geometric's recommended custodians, the client will negotiate terms and arrangements for their account with that custodian, and Geometric will not seek better execution services or prices from other providers or be able to "batch" the client's transactions for execution with orders for other accounts managed by Geometric. As a result, clients may pay higher transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

### **Aggregating Trading**

Transaction costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made were executed at the same time. This is called aggregating trades or "block trading." Geometric retains the ability to aggregate the purchase and sale of securities for clients' accounts with the goal of seeking more efficient execution and more consistent results across accounts. Aggregated trading instructions will not be placed if it would result in increased administrative and other costs, custodial burdens, or other disadvantages. If client trades are aggregated, such aggregation will be done so as to not disadvantage any client and to treat all clients as fairly and equally as possible.

## **ITEM 13: REVIEW OF ACCOUNTS**

### **Reviews**

Account assets are monitored for rebalancing opportunities on a daily basis, and formally reviewed at least quarterly by an advisor for that client. Additional account reviews may be triggered by a number of factors, including client circumstance or market conditions.

## **Reporting**

Each client receives a written statement from the custodian that includes an accounting of all holdings and transactions in the account for the reporting period. In addition, Geometric provides written reports detailing performance in client accounts on an annual basis. Geometric provides quarterly invoices that contain detailed fee calculations and information about asset allocation.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. Economic Benefit Provided by Third Parties for Advice Rendered to Client**

Geometric has established an institutional relationship with Charles Schwab Advisor Services, member FINRA/SIPC/NFA ("Schwab"), an unaffiliated SEC-registered broker-dealer. Schwab is wholly independent from Geometric, and offers enhanced services to independent investment advisors, including custody of securities, trade execution platforms, and access to research not available to the general public. Access to the Schwab Advisor Services platform is provided at no charge to Geometric. Geometric receives access to software and related support without cost because Geometric renders investment management services to clients that maintain assets at Schwab. The software and related systems support may benefit Geometric, but not its clients directly. All "soft dollar" benefits Geometric receives from Schwab are eligible research and brokerage services under section 28(e) of the Securities Exchange Act of 1934. In fulfilling its duties to its clients, Geometric endeavors at all times to put the interests of its clients first. Clients should be aware; however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence Geometric's recommendation of this custodian over one that does not furnish similar software, systems support, or services. Geometric attempts to mitigate this potential conflict by performing regular reviews of execution services and by ensuring that clients are receiving the best possible value for costs paid.

Additionally, Geometric may receive the following benefits from Schwab: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

### **B. Compensation to Non-Advisory Personnel for Client Referrals**

Geometric does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **C. Compensation to Geometric for Client Referrals to Third-Party Investment Advisers**

Geometric has entered into an arrangement with an independent and unaffiliated third-party investment adviser to whom it will introduce certain potential clients that would be better served by such third-party adviser. If a referred client ultimately decides to engage the third-party adviser, Geometric will receive a percentage of the advisory fees earned by the third-party adviser from such client for a certain number of years. Referred clients will not be charged any additional fees as a result of Geometric's referral.

## **ITEM 15: CUSTODY**

Geometric deducts fees from client accounts, but would not have custody of client funds otherwise. Clients will receive statements directly from their custodian, and copies of all trade confirmations directly from their custodian.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. Each quarter, clients will receive an invoice itemizing the fees to be debited, including the formula used to calculate the fee, the amount of assets upon which the fee is based, and the time period covered by the fee. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

Geometric encourages clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on the quarterly report prepared by Geometric against the information in the statements provided directly from Schwab. Please alert Geometric of any discrepancies.

## **ITEM 16: INVESTMENT DISCRETION**

Investment management services are provided on a “discretionary” basis. When a client engages Geometric to provide investment management services on a discretionary basis, the firm will monitor the client’s accounts to ensure that they meet the agreed-upon asset allocation requirements. If any changes are needed to a client’s investments, Geometric will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. Clients may at any time place restrictions on the types of investments Geometric may use on their behalf, or on the allocations to each security type. Clients will receive written or electronic confirmations from their account custodian after any changes are made to their account. Clients will also receive statements from their account custodian at least quarterly. Clients engaging Geometric on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as part of the Wealth Management Agreement that outlines the responsibilities of both the client and Geometric.

## **ITEM 17: VOTING CLIENT SECURITIES**

### **Proxy Voting**

Geometric does not have or accept the authority to vote 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. Geometric does not give advice on how to vote proxies.

Copies of Geometric’s proxy voting policies are available upon request.

## **ITEM 18: FINANCIAL INFORMATION**

Geometric does not require the prepayment of fees more than six months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair Geometric's ability to meet its contractual obligations to its clients.

Neither Geometric nor any person related to Geometric has been the subject of a bankruptcy petition at any time in the past ten years.

ITEM 1: COVER PAGE

# GEOMETRIC WEALTH ADVISORS, LLC

WASHINGTON, DC  
(973) 525-4901 | [WWW.GEOMETRICADVISORS.COM](http://WWW.GEOMETRICADVISORS.COM)

Form ADV, Part 2B Brochure Supplement

Andrew S. Leonard

December 1, 2023

*This Brochure Supplement provides information about Andrew S. Leonard that supplements the Geometric Wealth Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact Geometric at (847) 873-9580 if you did not receive the Geometric Wealth Advisors, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.*

*Additional information about Andrew S. Leonard (CRD #5385133) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Andrew S. Leonard, CFP®**  
*Managing Partner*

**Year of Birth:** 1980

### **Education**

MBA, Harvard Business School  
BA, Emory University

### **Business Experience**

Geometric Wealth Advisors, LLC, Managing Partner, 2014 – present  
Classic Capital, Inc., Principal, 2007 – 2015  
Analysis Group, Inc., Senior Analyst (2004 – 2005) and Analyst (2002 – 2004)

### **Professional Designations**

*Certified Financial Planner™*

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (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 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must 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 10 hours over a two-day period, 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**

Andrew S. Leonard has no disciplinary history to disclose.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Mr. Leonard is not engaged in any investment-related business or occupation (other than this advisory firm).

### **ITEM 5: ADDITIONAL COMPENSATION**

Andrew’s only compensation for providing advisory services comes from his regular salary and ownership of Geometric Wealth Advisors, LLC.

### **ITEM 6: SUPERVISION**

Andrew S. Leonard is Managing Partner of the firm. He has no direct supervisor. However, Andrew’s activities are supervised from a compliance perspective by Patrick S. McGough, Chief Compliance Officer of the firm. Patrick can be reached at (847) 873-9580. All employees of Geometric Wealth Advisors, LLC are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with applicable federal securities laws, rules and regulations.

ITEM 1: COVER PAGE

# GEOMETRIC WEALTH ADVISORS, LLC

DENVER, CO  
(509) 599-4912 | [WWW.GEOMETRICADVISORS.COM](http://WWW.GEOMETRICADVISORS.COM)

Form ADV, Part 2B Brochure Supplement  
Thomas W. McAndrews

December 1, 2023

*This Brochure Supplement provides information about Thomas W. McAndrews that supplements the Geometric Wealth Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact Geometric at (847) 873-9580 if you did not receive the Geometric Wealth Advisors, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.*

*Additional information about Thomas W. McAndrews (CRD #6075681) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Thomas W. McAndrews**  
*Partner*

**Year of Birth:** 1985

### **Education**

MBA, Tuck School of Business at Dartmouth College  
BA, Eastern Washington University

### **Business Experience**

Geometric Wealth Advisors, LLC, Principal (2018 – 2020), Partner, 2020 – present  
Oliver Wyman Group, Engagement Manager (2016 – 2017) and Associate (2014 – 2016)  
Goldman, Sachs & Co., Associate, 2013 – 2014  
Bristlecone Advisors LLC, Associate, 2010 – 2011  
US Trust, Bank of America Private Wealth Management, Portfolio Analyst (2009 – 2010) and Portfolio Management Assistant (2008 – 2009)

### **Professional Designations**

Thomas W. McAndrews has earned the Chartered Financial Analyst (CFA) designation and is in good standing with the granting authority.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter-holders often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 23 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **ITEM 3: DISCIPLINARY INFORMATION**

Thomas W. McAndrews has no disciplinary history to disclose.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Mr. McAndrews is not engaged in any investment-related business or occupation (other than this advisory firm).

### **ITEM 5: ADDITIONAL COMPENSATION**

Thomas's only compensation for providing advisory services comes from his regular salary and ownership provided by Geometric Wealth Advisors, LLC.

### **ITEM 6: SUPERVISION**

Thomas W. McAndrews is supervised by Geometric's Managing Partner, Andrew S. Leonard. Andrew can be reached at (973) 525-4901. Thomas's activities are supervised from a compliance perspective by Patrick S. McGough, Chief Compliance Officer of the firm. Patrick can be reached at (847) 873-9580. All employees of Geometric Wealth Advisors, LLC are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with applicable federal securities laws, rules and regulations.

ITEM 1: COVER PAGE

# GEOMETRIC WEALTH ADVISORS, LLC

NEW YORK, NY  
(310) 384-2566 | [WWW.GEOMETRICADVISORS.COM](http://WWW.GEOMETRICADVISORS.COM)

Form ADV, Part 2B Brochure Supplement  
Trevor Sarif-Killea

December 1, 2023

*This Brochure Supplement provides information about Trevor Sarif-Killea that supplements the Geometric Wealth Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact Geometric at (847) 873-9580 if you did not receive the Geometric Wealth Advisors, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.*

*Additional information about Trevor Sarif-Killea (CRD # 7509340) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Trevor Sarif-Killea**  
*Principal*

**Year of Birth:** 1992

### **Education**

BA, Harvard University

### **Business Experience**

Geometric Wealth Advisors, LLC, Principal, 2022 – present  
Mount Sinai Health Partners, Strategy & Operations Associate, 2019 – 2022  
Boston Consulting Group, Associate, 2016 – 2018  
Decision Resources Group, Strategy Analyst, 2015 – 2016

## **ITEM 3: DISCIPLINARY INFORMATION**

Trevor Sarif-Killea has no disciplinary history to disclose.

## **ITEM 4: OTHER BUSINESS ACTIVITIES**

Mr. Sarif-Killea is not engaged in any investment-related business or occupation (other than this advisory firm).

## **ITEM 5: ADDITIONAL COMPENSATION**

Trevor's only compensation for providing advisory services comes from his regular salary provided by Geometric Wealth Advisors, LLC.

## **ITEM 6: SUPERVISION**

Trevor Sarif-Killea is supervised by Geometric's Partner, Thomas W. McAndrews. Thomas can be reached at (509) 599-4912. Trevor's activities are supervised from a compliance perspective by Patrick S. McGough, Chief Compliance Officer of the firm. Patrick can be reached at (847) 873-9580. All employees of Geometric Wealth Advisors, LLC are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with applicable federal securities laws, rules and regulations.

ITEM 1: COVER PAGE

# GEOMETRIC WEALTH ADVISORS, LLC

MINNEAPOLIS, MN  
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Form ADV, Part 2B Brochure Supplement  
Tracy L. Johnson

December 1, 2023

*This Brochure Supplement provides information about Tracy L. Johnson that supplements the Geometric Wealth Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact Geometric at (847) 873-9580 if you did not receive the Geometric Wealth Advisors, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.*

*Additional information about Tracy L. Johnson (CRD # 6645859) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Tracy L. Johnson**  
*Principal*

**Year of Birth:** 1982

### **Education**

MBA, Northwestern University - Kellogg School of Management  
BA, Northwestern University

### **Business Experience**

Geometric Wealth Advisors, LLC, Principal, 2021 – present  
Ameriprise Financial Services, Inc., VP, Analytics Strategy and Engagement (2019 – 2021), Senior Director of Strategy and Business Development (2018 – 2019), and Director of Strategy and Business Development (2016 – 2018)  
Bain & Company, Case Team Leader (2014 – 2016) and Consultant (2013 – 2014)  
Kraft Foods, Manager of Strategic Planning, 2008 – 2010  
Bain & Company, Senior Associate Consultant (2007 – 2008) and Associate Consultant (2005 – 2007)

### **Professional Designations**

*Certified Financial Planner<sup>TM</sup>*

The CERTIFIED FINANCIAL PLANNER<sup>TM</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the “CFP<sup>®</sup> marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> 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 62,000 individuals have obtained CFP<sup>®</sup> certification in the United States.

To attain the right to use the CFP<sup>®</sup> marks, an individual must 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 10 hours over a two-day period, 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**

Tracy L. Johnson has no disciplinary history to disclose.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Ms. Johnson is not engaged in any investment-related business or occupation (other than this advisory firm).

### **ITEM 5: ADDITIONAL COMPENSATION**

Tracy’s only compensation for providing advisory services comes from her regular salary provided by Geometric Wealth Advisors, LLC.

### **ITEM 6: SUPERVISION**

Tracy L. Johnson is supervised by Geometric’s Managing Partner, Andrew S. Leonard. Andrew can be reached at (973) 525-4901. Tracy’s activities are supervised from a compliance perspective by Patrick S. McGough, Chief Compliance Officer of the firm. Patrick can be reached at (847) 873-9580. All

employees of Geometric Wealth Advisors, LLC are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with applicable federal securities laws, rules and regulations.

ITEM 1: COVER PAGE

# GEOMETRIC WEALTH ADVISORS, LLC

VIENNA, VA

(831) 224-5894 | [WWW.GEOMETRICADVISORS.COM](http://WWW.GEOMETRICADVISORS.COM)

Form ADV, Part 2B Brochure Supplement

Michelle N. Pimentel

December 1, 2023

*This Brochure Supplement provides information about Michelle N. Pimentel that supplements the Geometric Wealth Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact Geometric at (847) 873-9580 if you did not receive the Geometric Wealth Advisors, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.*

*Additional information about Michelle N. Pimentel (CRD #5918996) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Michelle N. Pimentel, CFP®**  
*Principal*

**Year of Birth:** 1985

### **Education**

BA, Texas A&M University

### **Business Experience**

Geometric Wealth Advisors, LLC – Principal, 2023 – present  
Geometric Wealth Advisors, LLC – Senior Financial Planner, 2020 – 2023  
Integral Financial Solutions – Financial Paraplanner, 2019  
Zeiders Enterprises – Personal Financial Counselor, 2014 – 2022  
US Department of Defense – Financial Program Analyst, 2013 – 2016

### **Professional Designations**

*Certified Financial Planner™*

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (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 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must 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 10 hours over a two-day period, 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**

Michelle N. Pimentel has no disciplinary history to disclose.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Mrs. Pimentel is not engaged in any investment-related business or occupation (other than this advisory firm).

### **ITEM 5: ADDITIONAL COMPENSATION**

Michelle’s only compensation for providing advisory services comes from her regular salary provided by Geometric Wealth Advisors, LLC.

### **ITEM 6: SUPERVISION**

Michelle N. Pimentel is supervised by Geometric’s Partner, Thomas W. McAndrews. Thomas can be reached at (509) 599-4912. Michelle’s activities are supervised from a compliance perspective by Patrick S. McGough, Chief Compliance Officer of the firm. Patrick can be reached at (847) 873-9580. All employees of Geometric Wealth Advisors, LLC are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with applicable federal securities laws, rules and regulations.

ITEM 1: COVER PAGE

# GEOMETRIC WEALTH ADVISORS, LLC

ARLINGTON HEIGHTS, IL  
(847) 873-9580 | [WWW.GEOMETRICADVISORS.COM](http://WWW.GEOMETRICADVISORS.COM)

Form ADV, Part 2B Brochure Supplement  
Patrick S. McGough

December 1, 2023

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*Additional information about Patrick S. McGough (CRD #6624018) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Patrick S. McGough**  
*Principal*

**Year of Birth:** 1981

### **Education**

MBA, University of Chicago, Booth School of Business  
BS, University of Illinois, Urbana-Champaign

### **Business Experience**

Geometric Wealth Advisors, LLC, Principal, Chief Compliance Officer, 2016 – present  
Honeywell Inc., UOP LLC, Senior Strategic Marketing Manager (2015 – 2016), Senior Sales Support Manager (2013 – 2015), Product Manager (2011 – 2013), Engineering Manager (2008 – 2011), Project Engineer (2003 – 2008)

### **Professional Designations**

Patrick S. McGough earned the Chartered Financial Analyst (CFA) designation and is in good standing with the granting authority.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

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- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates

mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter-holders often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 23 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **ITEM 3: DISCIPLINARY INFORMATION**

Patrick S. McGough has no disciplinary history to disclose.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

Mr. McGough is not engaged in any investment-related business or occupation (other than this advisory firm).

### **ITEM 5: ADDITIONAL COMPENSATION**

Patrick's only compensation for providing advisory services comes from his regular salary provided by Geometric Wealth Advisors, LLC.

### **ITEM 6: SUPERVISION**

Patrick S. McGough is supervised by Geometric's Managing Partner, Andrew S. Leonard. Andrew can be reached at (973) 525-4901. Patrick is the Chief Compliance Officer of the firm. However, all employees of Geometric Wealth Advisors, LLC – Patrick included – are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with applicable federal securities laws, rules and regulations.