



## **Form ADV Part 2A – Disclosure Brochure**

**Effective: December 5, 2023**

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This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Georgia Wealth Partners, LLC (referred to as “we,” “our,” “us,” “firm,” “advisor,” or “GWP”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (678) 510-5280.

GWP is a registered investment advisor with the Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about GWP to assist you in determining whether to retain the Advisor.

Additional information about GWP and its Advisory Persons is available on the SEC’s website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 314602.

## Item 2: Material Changes

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This Disclosure Brochure, dated December 5, 2023, is our Other-Than-Annual Amendment. It contains information regarding GWP's qualifications, business practices, nature of the advisory services we provide, as well as a description of potential conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with the Advisor. Should you have any additional questions regarding our Firm or the contents of this Firm Brochure, please contact Corey Letson, Chief Compliance Officer (678) 510-5280 or via email at [cletson@georgiawealthpartners.com](mailto:cletson@georgiawealthpartners.com).

### **Material Changes Since our August 1, 2023, filing:**

**Item 10 was amended for the addition of GWP Insurance Services, LLC**

### **Full Brochure Available**

From time to time, we will amend this Disclosure Brochure to reflect changes in business practices, regulations, and other routine updates as required by the respective regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you annually and/or if a material change occurs.

To request a complete copy of our Brochure, please contact us by telephone at (678) 510-5280 or by email at [cletson@georgiawealthpartners.com](mailto:cletson@georgiawealthpartners.com). Alternatively, you can view the current Disclosure Brochure online at the SEC's Investment Advisor Public Disclosure website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov) by searching with our Firm name or CRD No. 314602.

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## **Item 4: Advisory Services**

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### **A. Firm Information**

Georgia Wealth Partners, LLC is a registered investment advisor with the Securities and Exchange Commission (“SEC”) since June 06, 2023 and was previously a state-registered investment advisor firm. The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Georgia. The Firm was founded in March 2014, and the principal owners are Donald Lee Crider, Jr. and Corey R. Letson. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by GWP.

### **B. Advisory Services Offered**

#### *Portfolio Management Services*

GWP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. GWP creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client’s specific situation. 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

GWP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. GWP will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

GWP seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and consideration of GWP’s economic, investment or other financial interests. To meet its fiduciary obligations, GWP attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, GWP’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 GWP’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings (“IPOs”) and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

### **Third Party Money Managers**

GWP may determine that opening an account with a professional third party money manager is in the client's best interest.

The programs allow clients to obtain portfolio management services that typically require higher minimum account sizes outside of the program. The money managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by the client. Due to the nature of these programs, each of the independent money managers is obligated to provide you with a separate disclosure document. Clients should carefully review this document for important and specific program details, including pricing.

Under these programs, GWP may:

- Assist in the identification of investment objectives;
- Recommend specific investment style and asset allocation strategies;
- Assist in the selection of appropriate money managers and review performance and progress;
- Recommend reallocation among managers or styles within the program; and
- Recommend the hiring and firing of money managers utilized by the client.

Clients should read the ADV Part 2A Disclosure Document of the money manager the client selects for complete details on the charges and fees that the client will incur.

### *SEI*

SEI Private Trust is one of GWP's primary third party managers. Based on the information that a client shares with GWP, the Advisor will analyze the client situation and recommend an appropriate asset allocation or investment strategy through the model portfolios available on the SEI Private Trust Company ("SPTC") platform. GWP may reallocate a client's model portfolio into another model portfolio depending on the changes in a client's risk profile, investment objectives, financial circumstances, and/or market conditions. Client circumstances shall be monitored on an ongoing basis by GWP. These reviews shall be conducted on a frequency preferred by the client but shall take place no less than annually. Such reviews shall include personal meetings, telephone, e-mail and other electronic communication methods.

### **Financial Planning Services**

GWP will typically provide a variety of financial planning and consulting services to Clients, as part of an overall wealth management engagement or pursuant to a separate financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs,

commence, or alter retirement savings, establish education savings and/or charitable giving programs. Ongoing financial planning services include semi-annual check ins with the client to assess the implementation of the plan, adjustments needed and assessing new variables in a client's financial picture. Clients will receive updated plan or new plans annually.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### **Estate Planning Solutions**

GWP offers estate planning solutions via Wealth.com. Wealth.com provides a holistic estate planning solution that allows users to create, manage and administrate estate plans through a technology platform. Wealth.com facilitates an optional hybrid model where clients can start the process digitally, but still receive a bespoke human experience by consulting live with one of our local T&E attorney partners for a fee.

Wealth.com allows our clients to create estate planning documents to action legacy objectives. Once referred to Wealth, our clients enter the Wealth platform and are guided through the document creation process by Wealth, not by the advisor. Though advisors can refer clients to the platform, our firm nor our advisors are not involved with the drafting of the legal documents and do not have the ability to make selections for the client. As advisors, we can receive read-only visibility of the client account so that we can help ensure they complete the process of creating and continue to monitor for optimization opportunities. We are not attorneys and do not provide legal advice. If a fee is charged, it is for facilitation of the process and ongoing support and monitoring. From a compliance standpoint, offering a Wealth account to a client is no different from any other estate planning referral an advisor can make. Wealth prioritizes advisor compliance with industry best practices regarding legal ethics and professional rules of conduct. Wealth.com works with attorneys who are nationally recognized experts in advising technology firms seeking to structure ethically compliant relationships with consumers of legal services and governmental regulators.

### **Written Acknowledgement of Fiduciary Status**

When we provide 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.

### **Services Limited to Specific Types of Investments**

GWP 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, commodities, non-U.S. securities and private placements. GWP may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Account Management**

Prior to engaging GWP to provide investment advisory services, each Client is required to enter into one or more written agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – GWP, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – GWP will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – GWP will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – GWP will provide investment management and ongoing oversight of the Client’s investment portfolio.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. GWP does not participate in any wrap fee programs.

### **E. Assets Under Management**

GWP has \$111,648,812 in discretionary assets under management and \$0 in non-discretionary assets under management as of December 31, 2022. Clients may request more current information at any time by contacting the Advisor.

## **Item 5: Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one more written agreements with the Advisor.

### **A. Fees for Advisory Services**

#### **Investment Management Services**

Investment advisory fees are paid quarterly, in arrears, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets und Investment advisory fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
\$2,000,001 to \$5,000,000	0.80%
Over \$5,000,000	0.65%

GWP uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of GWP's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

#### Third Party Money Manager Fees

Third-Party Money Manager fees are included in the fees paid by clients to GWP. Fees will be clearly defined in the contract that clients sign with the third-party money manager and their ADV Part 2A Brochure. The fees will not exceed any limit imposed by any regulatory agency. Specifically, GWP may direct clients to SEI Private Trust Company. The total client fees for accounts managed with GWP and SEI will not exceed 2.50% of AUM.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

GWP offers financial planning services on a membership basis. The membership levels are as follows:

GWP Money Membership	\$89/month
GWP Builder Membership	\$1,750 one-time fee plus \$89/month
GWP Collaborator Membership	\$5,000 one-time fee plus \$89/month

Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

#### Estate Planning Solutions via Wealth.com

GWP offers Estate Planning Solutions via Wealth.com. Fees for Estate Planning Solutions range from \$250 to \$750.

### **B. Fee Billing**

#### Payment of Portfolio Management Fees



Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian or may be invoiced and billed directly to the client on a quarterly basis. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] quarterly. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with GWP. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by GWP to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Payment of Third Party Money Manager Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party Advisor selected. Fees for selection of SEI private Trust company as third-party Advisor are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly in arrears.

#### Payment of Financial Planning Fees

One time and membership fees are paid via check, bank authorization online, or credit card payment online.

GWP Money Membership may be cancelled, without penalty, at any time. GWP Builder and GWP Collaborator Packages are billed on a monthly basis, but client agrees to engage GWP for a full twelve month period. Should the client terminate the subscription before the end of the twelve month period, the balance of the annualized amount will be billed and client will be responsible for paying the prorated fee for work completed but unpaid. One time planning fees are billed in advance for discussed and negotiated planning.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than GWP in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by GWP are separate and distinct from these custody and execution fees.

In addition, all fees paid to GWP for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of GWP, but would not receive the services provided by GWP which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by GWP to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

### Investment Management Services

GWP collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party generally with 30 days' written notice. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

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

### **E. Compensation for Sales of Securities**

GWP does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

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GWP does not charge performance-based fees for its investment advisory services. The fees charged by GWP are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

### **Item 7: Types of Clients**

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GWP offers investment advisory services to individuals, high net worth individuals, charitable organizations and state or municipal government entities. The amount of each type of Client is available on GWP's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. GWP generally does not impose a minimum relationship size.

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

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#### **A. Methods of Analysis**

GWP employs multiple methods of analysis in developing investment strategies for its Clients. Research and analysis from GWP are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

GWP's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. GWP uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

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

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

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

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

As noted above, GWP generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. GWP will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, GWP may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. GWP will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

### Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

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 twofold: 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.

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.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

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.

### Investment 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. 11 These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisors: Although GWP will seek to select only money managers who will invest clients' assets with the highest level of integrity, GWP's selection process cannot ensure that money managers will perform as desired and GWP will have no control over the day-to-day operations of any of its selected money managers. GWP would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks,

investment “style drift” or even regulatory breaches or fraud.

### Market Risks

The value of a Client’s holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### Risk of Specific Securities Utilized

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. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign

securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. 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. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

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.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

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.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve

a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

### **Item 9: Disciplinary Information**

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**There are no legal, regulatory, or disciplinary events involving GWP or its management persons.** GWP values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Advisor Public Disclosure website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov) by searching with the Advisor's firm name or CRD# 314602.

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

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As a registered investment advisor, we are required to disclose when we, or any of our principals, have any other financial industry affiliations.

#### **A. Financial Industry Activities**

GWP is not a registered broker/dealer and does not have an application pending as a broker/dealer.

#### **B. Financial Industry Affiliations**

GWP is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, the Firm's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

#### **C. Other Material Relationships**

Corey Russell Letson is an owner of GWP Insurance Services, LLC and a licensed insurance agent, 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 Advisor. GWP 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 GWP in connection with such individual's activities outside of GWP.

Donald Lee Crider, Jr. is an owner of GWP Insurance Services, LLC and a licensed insurance agent, 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 Advisor. GWP 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 GWP in connection with such individual's activities outside of GWP.

Christopher Rodney Piland is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities through GWP Insurance Services, LLC and/or additional agencies. 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 Advisor. GWP 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 GWP in connection with such individual's activities outside of GWP.

Gregory Keith Foster is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities through GWP Insurance Services, LLC. 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 Advisor. GWP 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 GWP in connection with such individual's activities outside of GWP.

GWP addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. GWP periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. GWP will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by GWP's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies

#### Selection of Other Advisors or Managers

GWP may direct clients to third-party investment Advisors to manage all or a portion of the client's assets. Clients will pay GWP its standard fee in addition to the standard fee for the Advisors to which it directs those clients. This relationship will be memorialized in each contract between GWP and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. GWP will always act in the best interests of the client, including when determining which third-party investment Advisor to recommend to clients. GWP will ensure that all recommended Advisors are licensed or notice filed in the states in which GWP is recommending them to clients.

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

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

GWP has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with GWP ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. GWP and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of GWP's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (678) 510-5280.

#### **B. Personal Trading with Material Interest**



GWP allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. GWP does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. GWP does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

GWP allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by GWP requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While GWP allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will GWP, or any Supervised Person of GWP, transact in any security to the detriment of any Client.**

## **Item 12: Brokerage Practices**

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### **A. Selection and Recommendation**

Although we do not maintain custody of client assets that we manage, we are deemed to have custody of client assets as we have the authority to deduct our advisory fees directly from the client’s account (see Item 15 – Custody). Client’s assets must be maintained in an account at a “qualified custodian,” generally a broker/dealer or bank.

GWP will require client to use SEI Private Trust Company as their “qualified custodian.” The Firm is independently owned and operated and is not affiliated with SEI Private Trust. SEI will hold your assets in a brokerage account and will buy and sell securities when we instruct them to do so. While we require that you SEI. We do not open the account for you, although we will assist you in doing so.

### **B. Research and Other Soft Dollar Benefits**

While GWP has no formal soft dollar program in which soft dollars are used to pay for third party services, GWP may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). GWP 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 GWP does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. GWP benefits by not

having to produce or pay for the research, products or services, and GWP will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that GWP's acceptance of soft dollar benefits may result in higher commissions charged to the client.

### **C. Brokerage for Client Referrals**

GWP does not receive any compensation from any third party in connection with the recommendation for establishing an account.

### **D. Directed Brokerage**

GWP will require clients to use a specific broker-dealer to execute transactions. Not all Advisors require clients to use a particular broker-dealer.

### **E. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. GWP will execute its transactions through the Custodian as authorized by the Client. GWP may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

### **F. Trade Error Policy**

The Firm maintains a record of any trading errors that occur in connection with investment activities of its clients. In accordance with SEC recommendations, the Firm will bear any losses due to trading errors. Gains generated as a result from a trade error will either: (i) follow the custodian's policy; (ii) be credited to the client's account; or (iii) be donated to charity. The Firm does not retain any gains associated with trade errors.

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

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### **A. Frequency of Reviews**

All client accounts for GWP's advisory services provided on an ongoing basis are reviewed at least Monthly by Donald Lee Crider, Jr., Owner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at GWP are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Donald Lee Crider, Jr., Owner. Financial planning clients are provided a onetime financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial

situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify GWP if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by GWP**

GWP has access to a variety of economic benefits, services, and products in connection with GWP's use of SEI's investment Advisor platform. The terms and availability of these benefits vary among advisors on the SEI platform (including GWP) depending on the business conducted with SEI and other factors. These services generally help GWP conduct its advisory business, but each specific benefit does not necessarily benefit each client.

Beyond access to SEI investment products, these include conferences, seminars and other educational and networking activities, business entertainment, reimbursement of travel and attendance expenses, research and other investment support services (such as client proposal and other financial planning support), technical and operational solutions (including the SEI Wealth Platform), marketing assistance (including joint marketing designed to promote SEI's investment products), compliance services, human resources consulting, risk management/insurance assistance, front office, middle office, back office and other administrative support (including providing clerical staff to assist in the completion of required paperwork), SEI attendance at client meetings, information technology services, continuity and succession planning, access to financing and banking options, trust services, portfolio reporting, automatic rebalancing, tax loss harvesting, waiver or payment of certain fees (including paying account transfer fees or other charges that GWP or its clients would incur when changing service providers), vendor discounts, discount pricing on SEI services, and broader practice management consulting. These benefits may be provided via SEI, its affiliates, or third parties and may be made available to GWP at no fee, at a discounted fee, or via financial compensation provided by SEI. Some of these offerings depend on GWP conducting a minimum amount or type of current or expected future business with SEI, or having a minimum account size or amount of assets under management with SEI or invested in SEI investment products. Certain of these services or products, including those provided by or paid for by SEI, may be used by GWP in connection with its general business activities, in addition to supporting GWP's interaction with SEI systems. The benefits, services, products, or payments discussed herein may be significant to GWP and create an incentive for the GWP to utilize SEI services or investment products for its customers rather than other service providers or investment products. However, GWP strives at all times to put the interests of its clients first, including when selecting custodians or investment products for clients. GWP is independently owned and operated; it is not affiliated with SEI.

## **B. Client Referrals from Solicitors**

GWP does not engage paid promoters for Client referrals.

### **Item 15: Custody**

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GWP does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct GWP to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by GWP to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

### **Item 16: Investment Discretion**

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GWP provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, GWP 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. In some instances, GWP's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to GWP).

### **Item 17: Voting Client Securities**

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GWP 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**

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Neither GWP, nor its management, have any adverse financial situations that would reasonably impair the ability of GWP to meet all obligations to its Clients. Neither GWP, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. GWP is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



## GEORGIA WEALTH PARTNERS

### **Privacy Policy**

March 14, 2023

An important part of the relationship we have with our clients is the information they share with us. We want each client to know how we treat their private information. We keep personal information such as Social Security Numbers and account balances confidential. We take steps to safeguard this data from anyone who should not have access to it. In dealing with GWP, clients can expect that we will take the steps outlined below to keep all their information confidential and secure.

#### **Our Privacy Policy**

In providing financial services and products to our clients, we collect certain non-public information about them. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to our clients, or as permitted by law. Protecting your privacy is important to us.

#### **Information We Collect**

The non-public personal information we have about clients includes what they give us when opening an

account or communicating with us. This could include:

- Name and address
- Social Security Number
- Investment objectives and experience
- Financial circumstances
- Employment history
- Account balance and account transactions

### **Information We Disclose**

We do not disclose personal information about our clients to third parties, other than the chosen Sub-Advisor. We may disclose anonymous information that cannot be linked to an individual client on occasion, but only to companies that we hire to help us provide products and services to our clients, or as required by law, or as authorized by the client personally. We do not sell personal client information to anyone.

### **How Information Is Used**

We use information about our clients to provide our investment advisory services to them, such as managing their investment account. We may disclose this information to third parties as permitted by law, including the outside broker-dealers, custodians, administrators, transfer agents, accountants or attorneys that we need to use to provide our services to clients. From time to time, we must give information about our business to regulatory authorities. This may, or may not, include personal information about our clients and their accounts.

### **How Information Is Safeguarded**

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of client information. These include confidentiality agreements with companies we hire to help us provide services to clients, password-protected user access to our computer files, and strict confidentiality policies that apply to all Firm personnel, vendors and contractors.

### **Your Data Choices**

You have the following choices with respect to your personal information:

**Decline to provide information.** We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

**How to contact us.** You can reach us in the following ways:

Office Location: 318 S Hill Street, Suite 200, Griffin, GA 30224

Email: cletson@georgiawealthpartners.com

Phone: (678) 510-5280

