

# **Berry Wealth Group, LP**

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

**Effective: November 2, 2023**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Berry Wealth Group, LP (“Berry Wealth Group” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 817-573-9595 or by email at [michelle@berrywg.com](mailto:michelle@berrywg.com).

Berry Wealth Group is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“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 Berry Wealth Group to assist you in determining whether to retain the Advisor.

Additional information about Berry Wealth Group and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 327346.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Berry Wealth Group. For convenience, the Advisor has combined these documents into a single disclosure document.

Berry Wealth Group believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Berry Wealth Group encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The Advisor has made the following changes to the Disclosure Brochure since the last distribution to Clients:

- The Advisor has updated their service offerings. Please see Item 4 for more information.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 327346. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 817-573-9595 or by email at [michelle@berrywg.com](mailto:michelle@berrywg.com).

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## Item 4 – Advisory Services

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### A. Firm Information

Berry Wealth Group, LP (“Berry Wealth Group” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Limited Partnership (LP) under the laws of the State of Texas. Berry Wealth Group was founded in December 2005. Berry Wealth Group is owned by JML Berry Enterprises, Michelle Berry and Jason Berry. Berry Wealth Group is operated by Michelle Berry (President and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Berry Wealth Group.

### B. Advisory Services Offered

Berry Wealth Group offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Berry Wealth Group's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

Berry Wealth Group provides tailored wealth management solutions to its Clients. This is achieved through personal Client contact and interaction while providing discretionary investment management services over Client portfolios and a broad range of comprehensive financial planning. These services are described below.

*Investment Management Services* – Berry Wealth Group provides customized investment management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Berry Wealth Group works closely with each Client to identify their investment goals, objectives, risk tolerance and financial situation in order to create a portfolio strategy. Berry Wealth Group will then construct a investment portfolio utilizing internal investment models that primarily consist of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”), individual stocks, and bonds that seek achieve the Client's investment goals. The Advisor may retain certain legacy holdings based on portfolio fit and/or tax considerations.

Berry Wealth Group's investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Berry Wealth Group will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Berry Wealth Group evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Berry Wealth Group may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Berry Wealth Group may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement.

Berry Wealth Group may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will Berry Wealth Group accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Financial Planning Services* - Berry Wealth Group will typically provide a variety of financial planning and consulting services to Clients as part of its overall wealth management services. 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.

Berry Wealth Group may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

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.

#### Retirement Plan Advisory Services

Berry Wealth Group provides retirement plan advisory services on behalf of the retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement (“IPS”) Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- Benchmarking Services

#### Use of Independent Managers

Berry Wealth Group will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the

Client's needs and objectives. The Advisor will perform initial and ongoing due diligence and oversight over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

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

Prior to engaging Berry Wealth Group to provide investment advisory services, each Client is required to enter into an agreement 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 – Berry Wealth Group, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Berry Wealth Group 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 – Berry Wealth Group will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Berry Wealth Group will provide investment management and ongoing oversight of the Client's investment portfolio.

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

Berry Wealth Group does not manage or place Client assets into a wrap fee program. Wealth management services are provided directly by Berry Wealth Group.

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

As of October 13, 2023, Berry Wealth Group Manages \$211,987,679 in discretionary Client assets. 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 the services described herein shall be required to enter into a written agreement with the Advisor.

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

#### Wealth Management Services

Wealth management fees are paid quarterly in advance pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior quarter. Wealth management fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
\$0 to \$999,999	1.15%
\$1,000,000 to \$5,999,999	1.00%
\$6,000,000 to \$30,000,000	0.75%
\$30,000,001 and over	Negotiable

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Berry Wealth Group will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing.

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.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.15%, billed quarterly, in advance of each calendar quarter, pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior calendar quarter.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from Independent Managers. The Advisor will only earn its wealth management fee as described above. The Advisor will be allocated a portion of the advisory fee collected by the Independent Managers pursuant to the terms of the executed agreement between the Advisor and the Independent Managers.

### **B. Fee Billing**

#### Wealth Management Services

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Berry Wealth Group at the end of the prior quarter. 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 and compare the statement provided by the Advisor to 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 Berry Wealth Group to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Use of Independent Managers

For Client accounts implemented through Independent Managers, the Client's overall fees will include the Advisor's wealth management fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Managers. The Independent Managers will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

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

Clients may incur certain fees or charges imposed by third parties, other than Berry Wealth Group, 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 Berry Wealth Group are separate and distinct from these custody and execution fees.

In addition, all fees paid to Berry Wealth Group 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 Berry Wealth Group, but would not receive the services provided by Berry Wealth Group 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 Berry Wealth Group 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**

### Wealth Management Services

Berry Wealth Group may be compensated for its wealth management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. 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. Upon termination, the Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

### Use of Independent Managers

In the event that the Advisor has determined that Independent Managers are no longer in the Client's best interest, the Advisor will have the discretion to terminate the relationship with the Independent Managers. The terms for termination are set forth in the respective agreements between the Advisor and the Independent Managers.

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

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

Berry Wealth Group does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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Berry Wealth Group offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and retirement plans. Berry Wealth Group generally requires a minimum wealth management fee of \$5,000 to effectively implement its investment process.

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

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

Berry Wealth Group primarily employs a fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Berry Wealth Group 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.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps 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 the fundamental 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.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and

trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Berry Wealth Group will be able to accurately predict such a reoccurrence.

As noted above, Berry Wealth Group generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Berry Wealth Group 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, Berry Wealth Group 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. Berry Wealth Group 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:

### 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.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment

obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**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 Berry Wealth Group or its management persons.** Berry Wealth Group 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 Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 327346.

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

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#### Insurance Agency Affiliations

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, Advisory Persons may earn commission-based compensation for selling insurance products, including insurance products sold to Clients. Insurance commissions earned by Advisory Persons are separate and in addition to the Advisor's wealth management fees. This practice presents a conflict of interest as Advisory Persons have an incentive to recommend insurance products to the Client. Clients are under no obligation, contractual or otherwise, to purchase insurance products through the Advisory Persons or the Advisor.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation, nor does this present a material conflict of interest. The Advisor will only earn its wealth management fee as described in Item 5.A.

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

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

Berry Wealth Group 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 Berry Wealth Group ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Berry Wealth Group and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Berry Wealth Group'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 817-573-9595 or via email at [michelle@berrywg.com](mailto:michelle@berrywg.com).

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

Berry Wealth Group allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Berry Wealth Group 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. Berry Wealth Group does not have a material interest in any securities traded in Client accounts.

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

Berry Wealth Group 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 Berry Wealth Group 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 Berry Wealth Group 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 Berry Wealth Group, or any Supervised Person of Berry Wealth Group, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Berry Wealth Group does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Berry Wealth Group to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Berry Wealth Group does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Berry Wealth Group does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Berry Wealth Group. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Berry Wealth Group may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

The Advisor will generally recommend that Clients establish their account[s] at Raymond James & Associates, Inc. ("Raymond James"). Raymond James is a FINRA-registered broker-dealer and New York Stock Exchange/SIPC member. Raymond James will serve as the Client's "qualified custodian". The Advisor maintains institutional relationships with Raymond James, whereby the Advisor receives economic benefits from the Custodian. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Berry Wealth Group does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Berry Wealth Group does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where Berry Wealth Group will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). Berry Wealth Group will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. 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. Berry Wealth Group will execute its transactions through the Custodian as authorized by the Client. Berry Wealth Group 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.

### **Item 13 – Review of Accounts**

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

Securities in Client accounts are monitored on a regular and continuous basis by Michelle Berry, Chief Compliance Officer of Berry Wealth Group. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

#### **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 Berry Wealth Group 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 Berry Wealth Group**

Berry Wealth Group is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. Berry Wealth Group does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Berry Wealth Group may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Berry Wealth Group may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform (Raymond James)

The Advisor has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. The Advisor contracts with Raymond James to receive custody, brokerage, software, and related support. Raymond James may provide additional resources and support in connection with this relationship.

## **B. Compensation for Client Referrals**

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

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Berry Wealth Group 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 Berry Wealth Group 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 Berry Wealth Group 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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Berry Wealth Group generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Berry Wealth Group. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Berry Wealth Group will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Berry Wealth Group does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Berry Wealth Group, nor its management, have any adverse financial situations that would reasonably impair the ability of Berry Wealth Group to meet all obligations to its Clients. Neither Berry Wealth Group, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Berry Wealth Group 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.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Michelle L. Berry, CFP®  
Owner and Chief Compliance Officer**

**Effective: November 2, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michelle L. Berry (CRD# 2953646) in addition to the information contained in the Berry Wealth Group, LP (“Berry Wealth Group” or the “Advisor”, CRD# 327346) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Berry Wealth Group Disclosure Brochure or this Brochure Supplement, please contact us at 817-573-9595 or by email at [michelle@berrywg.com](mailto:michelle@berrywg.com).

Additional information about Mrs. Berry is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2953646.

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**Berry Wealth Group, LP**

920 Whitehead Dr., Granbury, TX 76048  
Phone: 817-573-9595 \* Fax: 817-573-2136  
<http://berrywealthservicegroup.com>

## Item 2 – Educational Background and Business Experience

Michelle L. Berry, born in 1969, is dedicated to advising Clients of Berry Wealth Group as the Owner and Chief Compliance Officer. Mrs. Berry earned a Certified Financial Planner from College for Financial Planning in 2010. Mrs. Berry also earned a Bachelor of Science in Animal Science from Texas A&M University in 1992. Additional information regarding Mrs. Berry's employment history is included below.

### Employment History:

Owner and Chief Compliance Officer, Berry Wealth Group, LP	10/2023 to Present
Financial Advisor, Raymond James Financial Services Advisors, Inc.	01/1998 to 10/2023
Financial Advisor, Raymond James Financial Services, Inc.	11/1997 to 10/2023

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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 87,000 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 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®.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mrs. Berry.*** Mrs. Berry has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Berry.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Berry.***

However, we do encourage you to independently view the background of Mrs. Berry on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2953646.

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

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#### Insurance Agency Affiliations

Mrs. Berry is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Berry's role with Berry Wealth Group. As an insurance professional, Mrs. Berry will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Berry is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Berry or the Advisor. Mrs. Berry spends approximately 15% of her time per month in this capacity.

### **Item 5 – Additional Compensation**

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Mrs. Berry has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mrs. Berry serves as the Owner, CCO of Berry Wealth Group. Mrs. Berry can be reached at 817-573-9595.

Berry Wealth Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Berry Wealth Group. Further, Berry Wealth Group is subject to regulatory oversight by various agencies. These agencies require registration by Berry Wealth Group and its Supervised Persons. As a registered entity, Berry Wealth Group is subject to examinations by regulators, which may be announced or unannounced. Berry Wealth Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Tonya R. Powell  
Financial Advisor**

**Effective: November 2, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Tonya R. Powell (CRD# 5091043) in addition to the information contained in the Berry Wealth Group, LP (“Berry Wealth Group” or the “Advisor”, CRD# 327346) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Berry Wealth Group Disclosure Brochure or this Brochure Supplement, please contact us at 817-573-9595 or by email at [michelle@berrywg.com](mailto:michelle@berrywg.com).

Additional information about Mrs. Powell is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5091043.

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**Berry Wealth Group, LP**

920 Whitehead Dr., Granbury, TX 76048  
Phone: 817-573-9595 \* Fax: 817-573-2136  
<http://berrywealthservicegroup.com>

## Item 2 – Educational Background and Business Experience

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Tonya R. Powell, born in 1966, is dedicated to advising Clients of Berry Wealth Group as a Financial Advisor. Additional information regarding Mrs. Powell's employment history is included below.

### Employment History:

Financial Advisor, Berry Wealth Group, LP	10/2023 to Present
Associate Financial Advisor, Raymond James Financial Services Advisors, Inc.	06/2010 to 10/2023
Associate Financial Advisor, Raymond James Financial Services, Inc.	10/2007 to 10/2023

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mrs. Powell.*** Mrs. Powell has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Powell.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Powell.***

However, we do encourage you to independently view the background of Mrs. Powell on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5091043.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mrs. Powell is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Powell's role with Berry Wealth Group. As an insurance professional, Mrs. Powell will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Powell is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Powell or the Advisor. Mrs. Powell spends approximately 10% of her time per month in this capacity.

## Item 5 – Additional Compensation

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Mrs. Powell has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mrs. Powell serves as a Financial Advisor of Berry Wealth Group and is supervised by Michelle Berry, the Chief Compliance Officer. Mrs. Berry can be reached at 817-573-9595.

Berry Wealth Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Berry Wealth Group. Further, Berry Wealth Group is subject to regulatory oversight by various agencies. These agencies require registration by Berry Wealth Group and its Supervised Persons. As a registered entity, Berry Wealth Group is subject to examinations by regulators, which may be announced or unannounced. Berry Wealth Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Tanya D. Gilliam  
Branch Operations Coordinator**

**Effective: November 2, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Tanya D. Gilliam (CRD# 2573436) in addition to the information contained in the Berry Wealth Group, LP (“Berry Wealth Group” or the “Advisor”, CRD# 327346) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Berry Wealth Group Disclosure Brochure or this Brochure Supplement, please contact us at 817-573-9595 or by email at [michelle@berrywg.com](mailto:michelle@berrywg.com).

Additional information about Mrs. Gilliam is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2573436.

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**Berry Wealth Group, LP**

920 Whitehead Dr., Granbury, TX 76048  
Phone: 817-573-9595 \* Fax: 817-573-2136  
<http://berrywealthservicegroup.com>

## Item 2 – Educational Background and Business Experience

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Tanya D. Gilliam, born in 1969, is dedicated to advising Clients of Berry Wealth Group as the Branch Operations Coordinator. Mrs. Gilliam earned a high school diploma from Granbury High School in 1986. Additional information regarding Mrs. Gilliam's employment history is included below.

### Employment History:

Branch Operations Coordinator, Berry Wealth Group, LP	10/2023 to Present
Branch Operations Coordinator, Raymond James Financial Services Advisors, Inc.	07/2021 to 10/2023
Branch Operations Coordinator, Raymond James Financial Services, Inc.	07/2021 to 10/2023
Client Services Assistant, Raymond James Financial Services Advisors, Inc.	02/2018 to 06/2020
Client Services Assistant, Raymond James Financial Services, Inc.	02/2018 to 06/2020

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mrs. Gilliam.*** Mrs. Gilliam has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Gilliam.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Gilliam.***

However, we do encourage you to independently view the background of Mrs. Gilliam on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2573436.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mrs. Gilliam is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Gilliam's role with Berry Wealth Group. As an insurance professional, Mrs. Gilliam will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Gilliam is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Gilliam or the Advisor. Mrs. Gilliam spends approximately 10% of her time per month in this capacity.

Mrs. Gilliam is also the Owner of Rockin Rebel Ranch. Mrs. Gilliam spends approximately 25% of her time per month in this capacity.

Mrs. Gilliam is also the Owner of Gilliam Real Estate. Mrs. Gilliam spends approximately 10% of her time per month in this capacity.

## Item 5 – Additional Compensation

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Mrs. Gilliam has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mrs. Gilliam serves as the Branch Operations Coordinator of Berry Wealth Group and is supervised by Michelle Berry, the Chief Compliance Officer. Mrs. Berry can be reached at 817-573-9595.

Berry Wealth Group has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Berry Wealth Group. Further, Berry Wealth Group is subject to regulatory oversight by various agencies. These agencies require registration by Berry Wealth Group and its Supervised Persons. As a registered entity, Berry Wealth Group is subject to examinations by regulators, which may be announced or unannounced. Berry Wealth Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: November 2, 2023

### Our Commitment to You

Berry Wealth Group, LP ("Berry Wealth Group" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Berry Wealth Group (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Berry Wealth Group does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Berry Wealth Group does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Berry Wealth Group or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Berry Wealth Group does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 817-573-9595 or via email at [michelle@berrywg.com](mailto:michelle@berrywg.com).