

**Gibson Wealth Advisors, LLC**  
Form ADV-CRS (Customer Relationship Summary) Part 3  
March 8, 2022

**Item 1: Introduction**

Gibson Wealth Advisors, LLC (“GWA, or we or us) is an investment adviser registered with the United States Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2: Relationships and Services**

**What investment services and advice can you provide to me?**

We offer investment advisory services to retail investors, including Comprehensive Financial Planning & Discretionary Investment Management Services

- We provide a comprehensive and integrated financial planning approach that coordinates your investments, tax planning, insurance, and estate planning all under one roof.
- This service involves collaborating one-on-one with a planner over an extended period. By paying an ongoing fee, clients get continuous access to a planner who will collaborate with them to design their plan. The planner will monitor the plan and recommend any changes. The client is responsible for providing up-to-date and accurate information regarding their financial situation and circumstances.
- Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known resources and variables to predict future resources, cash flows, asset values, and withdrawal plans.

*Investment Authority*

- We accept discretionary authority to manage securities accounts on behalf of clients. We have the authority to determine, without obtaining your specific consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. We do not act as a custodian of client assets. You always maintain asset control. We place trades for you under a limited power of attorney.
- You approve the custodian to be used and the commission rates paid to the custodian. We do not receive any portion of the transaction fees or commissions paid by you to the custodian on any trades. A limited power of attorney is a trading authorization for this purpose.

*Types of Clients, Account Minimums, Account Reviews.*

- Our clients are typically people, at or nearing retirement that want to delegate most of their financial matters and collaborate on the others. They are typically individual and high-net worth individuals. The annual minimum fee is \$5,000, which may be reduced or waived at the discretion of GWA.
- All accounts are reviewed with you by your assigned advisory representative, initially and at least annually or as agreed upon with you. The reviews focus on consistency of portfolio investments with investment objectives and risk tolerances. In addition, investment constraints are considered and tested against portfolio holdings.
- We do not use “wrap programs” or other mass distribution programs. We manage accounts on a client-by-client basis, and often on an account-by-account basis.

**For additional information**, please see our Form ADV, Part 2A brochure, specifically Items 4 and 7.

**Conversation Starters: Ask us the following questions –**

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

**Item 3: Fees, Costs, Conflicts and Standard of Conduct**

**What fees will you pay?**

If you open an advisory account, you will pay an on-going *asset-based fee* billed at the beginning of each quarter for our services, based on the value of the cash and investments in your advisory account. We also provide investment advice for an *hourly fee* or can provide a financial plan for a one-time *fixed fee*.

The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. You pay our fee quarterly even if you do not buy or sell.

Our fee is based on the total market value of your account on the last day of the quarter following your account’s effective date. Fees for individually managed accounts are priced within a range of 0.5% to 1.5% depending upon the amount of the assets in the account, the complexity of the financial plan and the advisory services necessary. The asset management fee will be determined at the time of the advisory agreement.

You may also be charged fees that are separate from our fees and may be charged directly or indirectly to you. These could include transaction fees, or fees to a broker-dealer or bank that holds your assets. Other fees you may pay include, but are not limited to, custodial fees.

# Gibson Wealth Advisors, LLC

Form ADV-CRS (Customer Relationship Summary) Part 3

March 8, 2022

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you will be paying.**

**For more information**, please see Form ADV, Part 2A brochure, Item 5.

**Conversation Starters: Ask us the following questions –**

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

## **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- **Example 1:** GWA and/or its investment advisory representatives may from time to time purchase or sell products or investments that they may recommend to clients. In such circumstances, GWA or its investment adviser representatives may have a financial interest in recommending investments that GWA or its representatives also own.
- **Example 2:** GWA and its investment adviser representatives receive compensation based on a percentage of your assets under management. As the value of your assets under management increase, total compensation you pay to GWA and its representatives also increases. However, if your account value decreases, you still pay a fee to GWA and its representatives.

**For additional information**, please see our Form ADV, Part 2A brochure, specifically Items 4 and 10.

**Conversation Starters: Ask us the following questions –**

- How might your conflicts of interest affect me, and how will you address them?

## **How do your financial professionals make money?**

Our financial services professionals are compensated on a portion of the total fees received by us and a base salary.

Our interests can conflict with your interests. We must tell you about them in a way you can understand, so that you can decide whether or not you to agree to them.

### **Item 4: Disciplinary History**

#### **Do you or your financial professionals have legal or disciplinary history?**

No, neither the Firm nor any of our financial professionals have a disciplinary history. We invite you to visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our Firm and financial professionals.

### **Item 5: Additional Information**

You should independently confirm all of the information stated here with our other regulatory filings. For additional information on our investment advisory services, see our Form ADV, along with the brochure supplement on each of our financial professionals, on IAPD on [Investor.gov](http://Investor.gov). Information regarding our firm can be found at [adviserinfo.sec.gov](http://adviserinfo.sec.gov) or by calling our firm at the telephone number listed below for up-to-date information. If you have a problem with your investments, investment account or a financial professional, contact us in writing at the address listed above. If you fail to gain timely satisfaction through this course of action, you may wish to report the problem to the SEC at [Investor.gov](http://Investor.gov) or call the toll-free investor assistance line at 800-732-0330.

**Your adviser serves as your primary contact with our firm. If you have concerns about how this person is treating you, you should contact our Chief Compliance Officer, Allen Gibson, at 214-347-7475.**

**Conversation Starters: Ask us the following questions –**

- Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?

*This brochure supplement provides information about Allen Gibson that supplements the Gibson Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Allen Gibson if you did not receive Gibson Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.*

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

**Gibson Wealth Advisors, LLC**  
Form ADV Part 2B – Individual Disclosure Brochure  
*for*  
**Allen Gibson**  
Personal CRD Number: 2192804  
Investment Adviser Representative

Gibson Wealth Advisors, LLC  
1015 Pruitt Place Suite 105  
Tyler, TX 75703  
214-347-7475  
[allen@gibsonwealthadvisors.com](mailto:allen@gibsonwealthadvisors.com)

UPDATED: March 8, 2022

## **Item 2: Educational Background and Business Experience**

**Name:** Allen Gibson      **Born:** 1965

### **Educational Background and Professional Designations:**

#### ***Education:***

Bachelor of Business Administration Finance, University of Texas - Arlington - 1985

#### ***Designations:***

##### **CFP® - Certified Financial Planner**

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

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

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:

- i. 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
- ii. Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

## **ChFC®- Chartered Financial Consultant®**

### **ChFC® MINIMUM QUALIFICATIONS:**

- Bachelor's degree or its equivalent, in any discipline, from an accredited university, this qualifies as one year of business experience
- Three years of full-time business experience is required; this three-year period must be within the five years preceding the date of the award (part-time qualifying business experience is also credited toward the three-year requirement with 2,000 hours representing the equivalent of one year full-time experience).
- Must fulfill the ChFC® seven course curriculum, as well as two additional elective courses
- Pass the exams for all required and elective courses
- Pass a background check and candidate fitness standards test. You must reveal any criminal history, pending litigation or ethical violations. The CFP board verifies all employment history, qualifications and disciplinary issues via FINRA's Central Registration Depository.

### **CEP® - Certified Estate Planner**

### **RSSA® - Registered Social Security Analyst**

### **NSSA - National Social Security Advisor**

### **BFA® - Behavioral Financial Advisor**

### **CLTC® - Certificate in Long-Term Care**

### **CDFATM - Chartered Divorce Financial Analyst**

### **CRPC® - Chartered Retirement Planning Counselor**

### **Ed Slott's Elite IRA Advisor GroupSM**

### ***Business Background:***

11/2016 - Present	Managing Member, CCO & IAR Gibson Wealth Advisors LLC
10/1991 – 11/2016	Financial Advisor Ameriprise
06/2009 - 10/2011	Financial Advisor Securities America
10/1991 - 07/2006	Financial Advisor IDS Financial Services

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

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

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

### **Item 5: Additional Compensation**

Aside from the commissions noted above, Allen Gibson does not receive any economic benefit from any person, company, or organization, other than Gibson Wealth Advisors, LLC in exchange for providing clients advisory services through Gibson Wealth Advisors, LLC.

### **Item 6: Supervision**

As the Chief Compliance Officer of Gibson Wealth Advisors, LLC, Allen Gibson supervises all activities of the firm. Allen Gibson's contact information is on the cover page of this disclosure document. Allen Gibson adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

### **Item 7: Requirements For State Registered Advisers**

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Allen Gibson has not been involved with any arbitration or administrative proceeding events.
- B. Allen Gibson has not been the subject of a bankruptcy petition.

*This brochure supplement provides information about Victor Trice Williams that supplements the Gibson Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Victor Trice Williams if you did not receive Gibson Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.*

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

**Gibson Wealth Advisors, LLC**  
Form ADV Part 2B – Individual Disclosure Brochure  
*for*  
**Victor Trice Williams**  
Personal CRD Number: 4219425  
Investment Adviser Representative

Gibson Wealth Advisors, LLC  
1015 Pruitt Place Suite 105  
Tyler, TX 75703  
214-347-7475  
[vic@gibsonwealthadvisors.com](mailto:vic@gibsonwealthadvisors.com)

UPDATED: March 8, 2022

## **Item 2: Educational Background and Business Experience**

**Name:** Victor Trice Williams      **Born:** 1964

### **Educational Background and Professional Designations:**

#### ***Education:***

Bachelor of Science Math Education, Northeastern St. University - 1988

#### ***Business Background:***

11/2016 - Present	Investment Advisor Representative Gibson Wealth Advisors LLC
08/2002 - 11/2016	Financial Advisor Ameriprise Financial Services Inc
08/2002 - 07/2006	Agent IDS Life Insurance Company

## **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

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

Victor Trice Williams is not engaged in any investment-related business or occupation (other than this advisory firm).

## **Item 5: Additional Compensation**

Aside from the commissions noted above, Victor Trice Williams does not receive any economic benefit from any person, company, or organization, other than Gibson Wealth Advisors, LLC in exchange for providing clients advisory services through Gibson Wealth Advisors, LLC.

## **Item 6: Supervision**

As a representative of Gibson Wealth Advisors, LLC, Victor Trice Williams is supervised by Allen Gibson, the firm's Chief Compliance Officer. Allen Gibson is responsible for ensuring that Victor Trice Williams adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Allen Gibson is (888) 888-1235.

## **Item 7: Requirements For State Registered Advisers**

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Victor Trice Williams has not been involved with any arbitration or administrative proceeding events.
- B. Victor Trice Williams has not been the subject of a bankruptcy petition.

# Gibson Wealth Advisors, LLC

*Item 1: Cover Page*

*This brochure provides information about the qualifications and business practices of Gibson Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (888) 888-1235 or by email at: [allen@gibsonwealthadvisors.com](mailto:allen@gibsonwealthadvisors.com). The information in this brochure has not been approved or verified by the*

*United States Securities and Exchange Commission or by any state securities authority. Additional information about Gibson Wealth Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Gibson Wealth Advisors, LLC's CRD number is: 285077.*

1015 Pruitt Place Suite 105  
Tyler, TX 75703  
214-347-7475

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<https://www.gibsonwealthadvisors.com>

*Registration does not imply a certain level of skill or training.  
Version Date: March 8, 2022*

## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Gibson Wealth Advisors, LLC on March 4, 2021 are described below. Material changes relate to Gibson Wealth Advisors, LLC's policies, practices or conflicts of interests.

- Gibson Wealth Advisors, LLC has updated its contact number. (Cover page)
- Gibson Wealth Advisors, LLC has updated its assets under management (Item 4)
- Gibson Wealth Advisors, LLC has updated its fee schedules (Item 5)

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## Item 4: Advisory Business

### **A. Description of the Advisory Firm**

Gibson Wealth Advisors, LLC (hereinafter “GWA”) is a Limited Liability Company organized in the State of Texas. The firm was formed in November 2016, and the principal owner is Allen Robert Gibson.

### **B. Types of Advisory Services**

#### ***Comprehensive Financial Planning & Discretionary Investment Management Services***

We provide a comprehensive and integrated financial planning approach that coordinates your investments, tax planning, insurance, and estate planning all under one roof. We do this, in part, by leveraging the relationships that we have with various tax, estate & insurance professionals. Most people have investments and insurance products purchased over the years without any real oversight or strategy. We believe that an integrated approach with ongoing monitoring, management and accountability delivers superior outcomes.

Our clients are typically people, at or nearing retirement that want to delegate most of their financial matters and collaborate on the others.

This service involves collaborating one-on-one with a planner over an extended period. By paying an ongoing fee, clients get continuous access to a planner who will collaborate with them to design their plan. The planner will monitor the plan and recommend any changes. The client is responsible for providing up-to-date and accurate information regarding their financial situation and circumstances.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known resources and variables to predict future resources, cash flows, asset values, and withdrawal plans.

In general, financial planning may address any or all the following areas of concern, depending on a client's age, stages of life and changing circumstances. Areas of importance and urgency tend to change throughout a client's life. Changes in employment, marital status, birth, deaths are some examples that may influence what areas may be of more importance in a given time frame.

These areas may include, but are not limited to, the following:

**Financial Goals & Bucket List Items:** We will help identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

**Cash Flow and Debt Management:** Reviewing income, expenses, and budgeting. Analyzing debt, like mortgages, credit cards and other consumer debt to identify more efficient payoff strategies. Determining appropriate cash reserve that should be considered for emergencies and other financial goals.

**Longevity Planning:** Creating personalized projections of a client's health and cost of care based on genetics and lifestyle, to develop a reasonable life expectancy as well as potential medical and extended care costs for planning purposes.

**Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant negative financial impact, such as premature death, disability, home, auto, umbrella, liability, property and casualty losses, or the need for long-term care planning. Evaluating health insurance plans offered on the ACA Marketplace and Medicare consulting.

**Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes, including Roth conversions, Health Savings Accounts, tax-loss harvesting of investments, with consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area. We will participate in meetings or phone calls between you and your tax professional with your approval.

**Personal Tax Return Preparation:** GWA is not an accounting firm, but we provide integrated tax planning, preparation and filing services through our relationships with outside accounting firms, such as XY Tax Solutions.

**Employee Benefits Optimization:** We will provide review and analysis to ensure you understand and are maximizing the benefits available to you at work. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

**Investment Recommendations & Management:** Developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, managing and monitoring portfolios, rebalancing, tax-loss harvesting, and reviewing employee stock options.

GWA manages brokerage accounts on a discretionary basis, meaning that our clients have empowered us to make changes (buys and sells) without consulting with them first. We typically review portfolio allocations weekly, but no less than monthly, to determine if there is a need for rebalancing, or an opportunity to harvest losses for tax purposes. We do not attempt to time the market or react to the news of the day. Our investment time horizon is forever.

**College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount.

**Retirement Planning:** Includes projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. We may make recommendations (e.g., working longer, saving more, spending less, taking more risk with investments). Optimizing the use of individual and employer sponsored retirement plans, such as IRA's, 401k's, 403b's, and managing Required Minimum Distributions.

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

**Social Security:** Educating to better understand the program, how it may integrate with other pensions and the different claiming options. Analysis to help optimize which strategies may potentially provide more benefits to a client, their spouse, and their family.

**Medicare:** Consulting on original Medicare A & B, Medicare Advantage Plans, Medicare Part D, Medicare Supplements to understand the costs and benefits and plans available in your area and which may be better suited for clients based on factors such as their health, prescription medications.

**Estate Planning:** Reviewing your current estate plan which may include beneficiary designations, wills, trusts, advanced directives, such as a durable power of attorney, health care power of attorney, directive to physicians and other related documents. Determining your potential exposure and ways to minimize future estate & gift taxes.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

**Estate Planning Documents:** GWA is not a law firm, nor do we provide legal advice. We do have relationships with several estate planning firms that can provide advice and the creation of estate planning documents, such as wills, trusts, advanced directives, and other related documents.

**Trust Administration:** Managing assets within a trust as a fiduciary according to the trust language for the benefit of the beneficiaries.

**Charitable Gifting:** Charitable gifting strategies using Donor-Advised Funds and other strategies.

We do not receive any commissions, bonuses, trips, or t-shirts for selling any investment, insurance, or annuity products. We do not receive any form of compensation for referring clients to other professionals.

### **C. Client Tailored Services and Client Imposed Restrictions**

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

### **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. GWA does not participate in any wrap fee programs.

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

As of December 31, 2022, GWA has the following assets under management:

Discretionary assets: \$114,653,699

Non-discretionary Assets: \$0

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

### **A. Fee Schedule**

#### ***Portfolio Management Fees***

GWA advisory fees are based on a percentage of assets under management according to the following schedule:

<b>Assets Under Management</b>	<b>Annual Percentage of Assets Charge</b>
\$0 to \$1,000,000	1.50%
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 to \$5,000,000	0.75%
Over \$5,000,000	0.50%

GWA uses an average of the daily balance in the client's account throughout the billing period, after considering deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

In certain situations, our fees may be negotiable, and the final fee schedule is included in GWA Advisory Agreement. Clients may terminate the Advisory Agreement upon written notice without penalty. Billing will continue up to the point that termination notice is received.

You must authorize us to have the custodian/broker-dealer pay us directly by charging your account. This authorization must be provided in writing. One-twelfth of the annual fee is charged each calendar month.

#### **Monthly Fee Calculation**

Assets under Management X Annual Fee ÷ 12 = Monthly Fee

The asset-based advisory fee payable for any Qualified Account (as defined below in Item 15, Custody) will be deducted directly from one of your other custodian/broker-dealer accounts. If there are insufficient funds available in another account or if GWA believes that deducting the fee from another account would be prohibited by applicable law, GWA will invoice you. Invoices must be paid within thirty (30) days of receipt and will bear interest after it becomes due and payable and shall continue to accrue interest until payment is made at a rate equal to the lesser of either (a) two percent (2%) above the prime rate as reported by Federal Reserve Bank of New York, located in New York, New York, as of the date such payment was due and payable, or (b) the maximum rate permitted by applicable law. In the event you terminate GWA's advisory agreement, all prepaid advisory fees will be returned to you on a pro rata basis determined by the number of days remaining in the month of termination.

#### ***Financial Planning Fees***

##### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$5,000 and \$100,000.

### **Hourly Fees**

The negotiated hourly fee for these services is \$350.

Clients may terminate the agreement without penalty, for full refund of GWA's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Upon termination of the account, any unearned fee will be refunded to the client on a prorated basis.

### **B. Payment of Fees**

#### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

#### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check or credit card.

Fixed financial planning fees are paid in advance.

Hourly financial planning fees are paid in arrears upon completion of work.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, ETF, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by GWA. Please see Item 12 of this brochure regarding broker dealer/ custodian.

### **D. Prepayment of Fees**

GWA collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account. GWA neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance.

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

### **E. Outside Compensation For the Sale of Securities to Clients**

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

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

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

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

Our clients are typically people, at or nearing retirement that want to delegate most of their financial matters and collaborate on the others. They are typically individual and high-net worth individuals.

The annual minimum fee is \$5,000, which may be reduced or waived at the discretion of GWA.

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

### **A. Methods of Analysis and Investment Strategies**

#### ***Methods of Analysis***

When clients have us provide investment advice as part of their financial plan, GWA utilizes several sources to analyze investment securities and develop portfolio management strategies and allocations. This includes, but is not limited to, asset modeling software, financial websites and research reports on mutual funds and exchange traded funds.

In general, in determining an overall strategy, GWA follows the guiding principles of Modern Portfolio Theory (“MPT”) and the Efficient Market Hypothesis (“EMH”).

#### **Modern Portfolio Theory (MPT)**

If you understand the saying “don’t put all your eggs in one basket” then you understand the basics behind MPT. MPT says that through diversification, the process of spreading your money across numerous investments, you can reduce risk.

By following MPT, GWA puts together a selection of investments that are designed to provide the greatest return for any given level of investment risk. Over longer time frames, research shows that the potential for higher returns comes from riskier assets, which also entail additional short-term risk (volatility). If you desire the potential for higher long-term returns, then it is likely a recommendation will be made to allocate a higher percentage of your portfolio toward riskier assets.

#### **The Efficient Market Hypothesis (EMH)**

EMH states that the financial markets do not allow investors to earn above-average returns without accepting above-average risks. EMH does not necessarily mean that markets are rational, or that they always price assets accurately. In the short run, investments can become over-valued (think tech stocks in 1999, or real estate in 2006) or under-valued (think stock prices in March 2009). Research supporting EMH shows the evidence is overwhelming that however inconsistent and irregular the behavior of stock prices may be, the market does not create trading opportunities that enable investors to earn extraordinary risk-adjusted returns.

Following MPT and EMH does not protect an account, investment, or client from investment losses, including the loss of the entire amount invested. Future security returns are unknown. Accounts may go down in value, and emotional decisions that are not in line with a client’s longterm investment strategy may result in the client losing significant amounts of money. Similarly, even decisions that are in line with a client’s long-term investment strategy may lead to the same result. Investing in securities involves risk of loss that clients should be prepared to bear.

**GWA believes that the investment markets will be unpredictable and volatile and may go down and stay down for months, sometimes years at a time. If an investor is unprepared or unwilling to experience a prolonged market downturn, they should not invest in the markets.**

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

## **B. Investment Strategies**

### ***Investment Strategies***

GWA primarily utilizes Vanguard exchange-traded funds (ETFs) and mutual funds in the management of client portfolios. GWA believes that Vanguard funds most effectively capture the returns of target asset classes and provide the best opportunity to effectively implement the investment policies of client portfolios, and thereby gain the greatest benefit from the firm's methodology.

Vanguard and other fund companies provide clients with prospectuses that identify potential risks involved in investing in the funds used in client portfolios. The analysis of asset classes includes reviewing historical and expected rates of return, standard deviations, and correlation coefficients between asset classes. Investment policies with target asset allocations are prepared in recognition of each client's risk tolerance, investment objectives and constraints, and long-term goals. We will periodically review and rebalance portfolios to maintain the desired allocation and meet with clients as needed to ensure portfolio allocation remains up to date with their objectives.

### **Passive Investment Management**

We primarily practice passive investment management combined with active rebalancing. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index exchange traded funds or mutual funds. Passive investment management is characterized by low portfolio expenses (i.e., the funds have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal). In contrast, active management typically involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates that most active managers underperform their respective index. We rebalance our portfolio allocation when our holdings have increased or decreased beyond our acceptable tolerance.

## **C. Risk of Loss**

### **Risks of Loss**

GWA's investment strategy relies on maintaining a diversified portfolio that is consistent with the client's long-term goals and tolerance for risk & volatility. The fundamental factor is the allocation of the portfolio, or how much of the portfolio is invested in stocks, bonds, and other asset categories. Even when investing in diversified ETF's and mutual funds, investing in securities involves risk of loss that clients should be prepared to bear. These risks include, but are not limited to:

**Market risk** (also known as systematic risk) – risk that is common to all securities of the same general class (such as stocks or bonds) regardless of the merits of a particular stock or bond; in other words, if the overall stock market declines, it is likely that all stocks will decline.

**Interest rate risk** – risk that changes in interest rates will affect the value of bonds; if interest rates go up, bond prices will typically fall, and vice versa.

**Selection (manager) risk** – risk that the mutual funds chosen will not perform as well as other funds that invest in similar securities.

**Allocation risk** – risk that the portfolio’s diversification will not correspond to the client’s long-term goals and needs.

**Inflation risk** – risk that inflation (increase in prices) will erode the client’s purchasing power if the portfolio does not keep pace with it.

**Liquidation risk** – risk that an unanticipated need to sell securities may come at a period of market decline.

**Concentration Risk** - a portfolio that focuses on a too few investments, companies, stocks, bonds, geographic areas, sectors of the economy or industries.

**Issuer Risk** - A portfolio’s performance depends on the performance of individual securities to which the portfolio has exposure. Changes to the financial condition or credit rating of an issuer of those securities may cause the value of the securities to decline or become worthless.

**Currency/Exchange Rate Risk** - overseas investments, even if made by domestically based companies, are subject to fluctuations in the value of the dollar against the currency of the investment’s originating country.

**Income Risk** - a portfolio’s income may decline when interest rates decrease.

**Reinvestment Risk** - risk that future proceeds from existing fixed income investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate).

**Credit/Default Risk** - Debt issuers and other counterparties of fixed income securities or instruments may default on their obligation to pay interest, repay principal, or make a margin payment, or default on any other obligation.

**U.S. Economic Risk** - The United States is a significant trading partner with other countries. Certain changes in the U.S. economy may have an adverse effect on the economy and markets of other countries.

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

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

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

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

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

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

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

Neither GWA nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

GWA does not utilize nor select third-party investment advisers. All portfolios are managed by GWA.

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

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

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

### **B. Recommendations Involving Material Financial Interests**

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

**Retirement Plan Rollovers:** A client or prospective client leaving an employer has several options for the company retirement plan, which may include leaving the assets in the plan, moving to another employer's plan, moving the assets to an Individual Retirement Account (IRA), or withdrawing the assets altogether (which could have adverse tax consequences). GWA

reviews all these options with the client or prospective client including the costs and administrative and investment impact of each. If GWA recommends that the client roll over the retirement plan assets into an account managed by GWA, such a recommendation creates a conflict of interest if GWA will earn additional fees on the rolled over assets. No client is under any obligation to roll over any retirement plan assets to an account managed by GWA.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of GWA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GWA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. GWA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

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

## **Item 12: Brokerage Practices**

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

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

GWA will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

### ***Research and Other Soft-Dollar Benefits***

Soft dollar practices are arrangements whereby an investment adviser directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a "safe harbor," which provides that an investment adviser that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the adviser determines in

good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

GWA does not currently have any soft dollar benefit arrangements.

### ***1. Brokerage for Client Referrals***

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

### ***2. Clients Directing Which Broker/Dealer/Custodian to Use***

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

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If GWA buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, GWA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. GWA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

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

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

GWA discretionary accounts are typically reviewed weekly, but no less than monthly, to determine the need for rebalancing or opportunities for tax-loss harvesting. All financial planning accounts are reviewed upon financial plan creation and plan presentation.

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

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

Client's may request a non-periodic review of their accounts.

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

### **C. Content and Frequency of Regular Reports Provided to Clients**

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

Each financial planning client will receive the financial plan upon completion.

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

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

GWA participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. GWA receives some benefits from TD Ameritrade through its participation in the Program.

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

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

GWA pays referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to GWA in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940. Specifically, Raymond W Cozby III will act as solicitors for GWA. Such referral fee represents a share of GWA's investment advisory fee charged to our clients. This arrangement will not result in higher costs to the referred client. In this regard, GWA maintains Solicitors Agreements in compliance with Rule 206 (4)-3 of the Investment Advisers Act of 1940 and applicable state and federal laws. All clients referred by Solicitors to GWA will be given full written disclosure describing the terms and fee arrangements between GWA and Solicitor(s). In cases where state law requires licensure of solicitors, GWA ensures that no solicitation fees are paid unless the solicitor is registered as an investment adviser representative of GWA. If GWA is paying solicitation fees to another registered investment adviser, the licensure of individuals is the other firm's responsibility.

GWA engages independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice is disclosed to the client in writing by the solicitor and the Advisor pays the solicitor out of its own funds—specifically, the Advisor generally pays the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. GWA’s policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

## **Item 15: Custody**

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them.

GWA does not have direct custody of any client funds and/or securities. GWA will not maintain physical possession of client funds and securities. Instead, clients’ funds and securities are held by a qualified custodian.

However, we may be deemed to have custody when you authorize us to deduct our fees from your account. You will receive statements from the custodian/broker-dealer that holds your investment account on at least a quarterly basis. The statements will show the amount of our fee that was deducted. We urge you to carefully review these statements. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Certain Client Accounts subject to GWA’s services under this Agreement may be held at a custodian that is not directly accessible by the GWA (“Qualified Accounts”). GWA may, but is not required to, manage these Qualified Accounts using the Pontera Order Management System (“Pontera”) that allows Advisor to view and manage these assets. To manage Qualified Assets, you must agree to the Pontera End User Terms and Conditions and Privacy Policy and must further agree to keep GWA apprised of any changes to your usernames and passwords for Qualified Accounts so that GWA can promptly update the your credentials using the Pontera system. You also must agree to promptly address any requests to update its login credentials when requested by the Pontera system. In the event of any delay by you to update your login credentials, you must acknowledge in the agreement that GWA will not have access to view or manage the your Qualified Account, which may result in investment losses or inadvertently incorrect valuations being used in the billing process under the investment management agreement. GWA will not be responsible for any losses arising from your delays in updating its login credentials through the Pontera system and GWA will be under no obligation to credit any fees for valuations made in good faith during periods when GWA did not have access to any Qualified Account in calculating its fees under the investment management agreement.

While GWA does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client’s account application.

Custody is also disclosed in Form ADV because GWA has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, GWA will follow the safeguards specified by the SEC rather than undergo an annual audit.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of GWA's advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation. Clients should contact GWA directly if they believe that there may be an error in their statement.

## **Item 16: Investment Discretion**

GWA 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, GWA 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.

## **Item 17: Voting Client Securities (Proxy Voting)**

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

## **Item 18: Financial Information**

### **A. Balance Sheet**

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

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

In light of the COVID-19 coronavirus and historic decline in market values, GWA has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. GWA intends to use this loan predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, GWA has been able to operate and continue serving its clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

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

## **Item 19: Requirements For State Registered Advisers**

This section is not applicable as GWA is SEC registered and not state registered. More information of GWA's current management persons, Victor Trice Williams and Allen Robert Gibson, can be found on the Form ADV Part 2B brochure supplements for those individuals.

# Gibson Wealth Advisors, LLC

## PRIVACY NOTICE

**Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Gibson Wealth Advisors, LLC ("GWA").**

**Information We Collect:** In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others;
- Information about your visit to and store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the information electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user's experience.
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

**Categories of Information We Disclose:** We may only disclose information that we collect in accordance with this policy. GWA does not sell customer lists and will not sell your name to telemarketers.

**Categories of Parties to Whom We Disclose:** We will not disclose information regarding you or your account at GWA, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To comply with broker-dealer firms that have regulatory requirements to supervise certain representatives' activities;
- To consumer reporting agencies,
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

**How We Use Information:** Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or GWA;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

**Regulation S-AM:** Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the

marketing solicitations; and (3) the consumer has not opted out. GWA does not receive information regarding marketing eligibility from affiliates to make solicitations.

**Our Security Policy:** We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

**Succession Planning:** In the event that the owner(s) of GWA retire, become incapacitated or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of GWA would require your consent, as dictated by your signed agreement with GWA, in order to continue providing services to you.

**Your Right to Opt Out:** Federal privacy laws give you the right to restrict some sharing of your personal financial information. These laws balance your right to privacy with GWA's need to provide information for normal business purposes. You have the right to opt out of some information sharing with companies that are (1) Part of the same corporate group as your financial company (or affiliates); or (2) Not part of the same corporate group as your financial company (or non-affiliates). Choosing to restrict the sharing of our personal financial information will not apply to (1) Information about you to firms that help promote and market the company's own products or products offered under a joint agreement between two financial companies; (2) Records of your transactions--such as your loan payments, credit card or debit card purchases, and checking and savings account statements--to firms that provide data processing and mailing services for your company; (3) Information about you in response to a court order; and (4) Your payment history on loans and credit cards to credit bureaus. If you opt out, you limit the extent to which GWA can provide your personal financial information to non-affiliates.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Complaint Notification:** Please direct complaints to: Allen Gibson at Gibson Wealth Advisors, LLC, 1015 Pruitt Place, Suite 105. Tyler, Texas 75703. 214.347.7475

**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Gibson Wealth Advisors, LLC, 1015 Pruitt Place, Suite 105. Tyler, Texas 75703. 214.347.7475