



This brochure provides information about JGC Wealth Management, LLC's ("JGC Wealth Management") qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at 503.304.9248 or by email at [info@jgcwealth.com](mailto:info@jgcwealth.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about JGC Wealth Management is also available at the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select "investment advisor firm" and type in our firm name). Results will provide you with the latest filings of both Part 1 and 2 of our Form ADV.

We are a Registered Investment Advisor Firm. Our registration does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

**ITEM 1 – COVER PAGE ADV PART 2 A**

March 29, 2022

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## ITEM 2 – MATERIAL CHANGES

The purpose of this section is to discuss only material changes since the last annual update of JGC Wealth Management’s Investment Advisor Brochure.

The date of the last annual update was March 9, 2021.

### Summary of Material Changes:

1. Item 1 was updated to reflect the new office location for the firm.
2. Item 7 was updated to indicate investable assets of \$250,000 as the threshold for potentially declining to accept a prospective client.

### Delivery:

Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment.

Note: A full copy of JGC Wealth Management’s Investment Advisor Brochure can be found at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select “investment advisor firm” and type in our firm name). Results will provide you with the latest filings of both Part 1 and 2 of our Form ADV.

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## ITEM 4 – ADVISORY BUSINESS

### **4a: Firm Description**

JGC Wealth Management, LLC was established in October 2012. Our main office is located in Salem, Oregon.

#### **4a1: Principal Members**

- Michael A. Blanchard, Managing Member & Chief Compliance Officer: Mr. Blanchard may be contacted by email at michael@jgcwealth.com or by telephone at 503.304.9248.
- Joshua D. Morrow, Member: Mr. Morrow may be contacted by email at morrowj@jgcwealth.com or by telephone at 503.304.9248.

### **4b: Types of Advisory Services**

#### ***Asset Management***

JGC Wealth Management offers a variety of investment advisory services to our clients, which include small businesses, individuals and pension plans. We tailor our advice and services to your objectives, means and timelines. All clients will sign an Investment Advisory Agreement that will precisely define the types of services we are providing, our role in providing those services to you and how we may carry out those services for you.

As part of our investment advisory services, JGC Wealth Management may recommend that you use the services of a third-party Investment Advisor to manage a portion or all of your investment portfolio. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor performance to ensure its management and investment style remain aligned with your investment goals and objectives.

#### ***Retirement Plan Consulting***

JGC Wealth Management provides a full spectrum of retirement plan consulting to businesses and non-profits. We analyze a company or organization's current plan and tax structures, underlying investments, and employee census which we then align with company goals and objectives into a comprehensive plan. At that point, we are able to provide tailored ongoing management, employee servicing and education.

#### ***Financial Planning & Consulting***

JGC Wealth Management offers financial planning services for our clients. We typically prepare a written financial plan for financial planning clients. The plan considers all of your assets, liabilities, goals and objectives. You are encouraged to review your plans on a regular basis. The plan includes gathering all information necessary to provide you with appropriate and agreed-upon services, which may include one or more of the following:

- Investment Planning
- Investment Policy Statements
- Financial Independence
- Retirement Planning
- Capital Needs Analysis (Goal Funding)
- Estate Planning
- Education Planning
- Pension Consulting
- Risk Management

- Budgeting and Cash Flow Planning
- Debt Management

For California Residents: Subsection (j) of Rule 260.238, California Code of Regulations requires that all Investment Advisors disclose to their clients that lower fees for comparable services may be available from other sources. Pursuant to California Rule 260.235.2, if a conflict exists between the interests of the Advisor or its associated persons and the interest of the client; the client is under no obligation to act upon this Advisor's or associated person's recommendations. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the Advisor or its associated person when the person is an agent with a licensed broker-dealer or through any associate or affiliate of such person.

**4c: Client Tailored Relationships and Restrictions**

As a fiduciary, JGC Wealth Management always acts solely in your best interests. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions regarding the investments made in your portfolio. Restrictions on trading which, in our opinion, are not in your best interest cannot be honored and if forced may result in the termination of our agreement.

Similarly, you are under no obligation to act upon JGC Wealth Management's or associated person's recommendations. If you elect to act on any of the recommendations, you are under no obligation to effect the transaction through JGC Wealth Management or its associated person when the person is an agent with a licensed broker-dealer or through any associate or affiliate of such person.

**4d: Wrap Fee Program**

JGC Wealth Management does not sponsor or manage portfolios for any wrap fee programs.

**4e: Assets under Management (AUM)**

JGC Wealth Management, as of December 31, 2021, has \$79,038,106 in discretionary, reportable assets under management and \$12,026,674 in non-discretionary, reportable assets under management.

**ITEM 5 – FEES AND COMPENSATION**

**5a, b & d: Fee Schedules, Payments & Options**

***Asset Management Tiered Fee Schedule***

| <b>Assets Under Management</b> | <b>Annual Fee (%)</b> | <b>Quarterly Fee (%)</b> |
|--------------------------------|-----------------------|--------------------------|
| \$0 to \$249,999               | 1.40%                 | 0.350%                   |
| \$250,000 to \$499,999         | 1.00%                 | 0.250%                   |
| \$500,000 to \$749,999         | 0.85%                 | 0.2125%                  |
| \$750,000 to \$1,499,999       | 0.70%                 | 0.175%                   |
| \$1,500,000 to \$2,999,999     | 0.60%                 | 0.150%                   |
| \$3,000,000 or more            | 0.50%                 | 0.125%                   |

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported are valued at the last reported sale price on the principal market in which they are traded. All other assets are valued at fair value by JGC Wealth Management. Notwithstanding the above, fees are generally negotiable.

The fee includes the time and activities necessary to work with your attorney and/or accountant in reaching agreement on solutions, as well as assisting them in implementation of all appropriate documents. We are not responsible for attorney or account fees charged to you as a result of the above activities. Compensation for our services will be calculated in accordance with what is set in the client’s agreement. We may modify the terms of any agreement with at least 30 days prior written notice. All Investment Advisors are required to disclose to their clients that lower fees for comparable services may be available from other sources. In cases where there are third-party managers or sub-advisors, they are paid a portion of our fee.

JGC Wealth Management fees are paid from your account by the custodian when we submit an invoice to them. If there is insufficient cash in your account to pay your fees, an equal balance of securities in your portfolio may be sold to pay our fee. In addition to our fees, there may be custodial, mutual fund or similar third-party management fees and charges.

JGC Wealth Management fees are paid quarterly in arrears, with payment due within 10 days from the date of the invoice. Our quarterly fee is determined by taking the percentage rate we charge per quarter times the market value of the account on the last day of the quarter. The market value is the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial months at the commencement or termination of our agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the month. Quarterly fee adjustments for additional assets received into the account or for partial withdrawals during a quarter will also be provided based on the number of days in the calendar quarter that the assets were in the account.

***Retirement Plan Consulting Services***

Clients using Retirement Plan Consulting, LLC

Retirement plan consulting fees vary widely depending on the scope of services and the size of the plan. We work with an experienced third-party service provider, Retirement Plan Consultants, LLC (“RPC”), to provide full-service retirement plans and consulting. In more basic scenarios, we provide our services at a rate of \$250 an hour to provide guidance to businesses or non-profits. For ERISA covered 401(k) plans, we are paid a percentage of the assets under management as part of the agreement you sign with our partners. These fees are typically based on the following breakpoint\* fee schedule:

| <b>Managed Assets</b>       | <b>Annual Fee (%)</b> | <b>Quarterly Fee (%)</b> |
|-----------------------------|-----------------------|--------------------------|
| 0 to \$500,000              | 0.70%                 | 0.1750%                  |
| \$500,001 to \$1,000,000    | 0.60%                 | 0.1500%                  |
| \$1,000,001 to \$3,000,000  | 0.50%                 | 0.1250%                  |
| \$3,000,001 to \$10,000,000 | 0.40%                 | 0.1000%                  |
| \$10,000,001 and above      | Negotiable            | Negotiable               |

\* When plan asset balance hits the dollar threshold in the breakpoint fee schedule, the corresponding Fee (%) will apply to all plan assets.

Clients not using Retirement Plan Consulting, LLC

For Clients utilizing the services of other recordkeeping and administration companies, we can also provide our services on an individualized basis. Fees for Retirement Plan Consulting services will vary depending

on the specific needs for each plan, but are typically determined either on a flat fee, hourly basis, percentage of the assets under management, or combination thereof. Upon determining the plan needs, a description of our customized service and fee structure will be provided and mutually agreed upon prior to the start of service delivery.

In certain circumstances, these fees may be negotiable. There are also additional fees for RPC or other third-party managers, which include startup fees, annual account fees and per participant fees as set forth in the agreement you sign with them. The combined fees between JGC Wealth Management and its third-party service providers will not exceed 3% of assets under management. Clients are generally billed a single fee for both, depending on the agreement, from which we and the third-party are paid. Fees are deducted quarterly in advance directly from the account based on the prior quarter end balance of plan assets. In certain circumstances, we may provide a method for direct billing.

JGC Wealth Management is deemed to be a Fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, JGC Wealth Management is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. JGC Wealth Management only charges asset management or financial planning fees for our services and does not receive any commissions, 12b-1 fees or other forms compensation.

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

Fees for financial planning services are based on a rate of \$250.00 per hour. Special arrangements can be made for clients wishing on-going financial planning services.

Hourly financial planning fees are paid upon completion of the project. Services performed on a fixed fee basis require a retainer equal to one-half the fixed fee. The remaining balance will be billed in equal installments on a monthly basis until the project is completed. If invoiced, they are due within ten (10) days of invoice. Special arrangements may be made with clients wishing ongoing financial planning services.

#### **5.d: Termination**

Either JGC Wealth Management or our clients can terminate our agreement upon receipt of written notice to the other party, to include written agreement to changes by the client.

When a Financial Planning agreement is terminated, we will refund any pre-paid, unearned fees. Fees for our Asset Management services since the end of the prior quarter will be calculated on a prorated basis and withdrawn prior to account closure. Prorated refunds for Retirement Plan Consulting Fees will be made within 30 calendar days of the effective date of termination.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. Custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good-faith estimate of these fees.

#### **5c: Third-party Fees**



You are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees we charge.

All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. While we take measures to ensure the fees charged are accurate, it is your responsibility to ensure the amount of fee charged is correct. In addition to statements sent by us, you will receive statements directly from these brokers, custodians or mutual funds or other investments you hold. We strongly urge you to compare these statements for accuracy.

**5e: Other Investment Compensation**

JGC Wealth Management does not accept commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. As a result, our fees for advisory services remains the same regardless of the investment strategy selected by clients. Additionally, we do not have an incentive to recommend one investment vehicle over another.

**ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

JGC Wealth Management does not charge advisory fees on the performance of funds or securities in your account.

**ITEM 7 – TYPES OF CLIENTS**

JGC Wealth Management generally provides asset management and financial planning services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit-Sharing Plans
- Trusts
- Estates
- Charitable Organizations
- Corporations

***Minimum Account Size***

JGC Wealth Management does not have an account minimum. However, we may decline to accept clients with investable assets of less than \$250,000.

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

**8a: Analysis**

JGC Wealth Management uses multiple sources of information to obtain analysis and strategies. We include sources such as financial newspapers, financial magazines, financial websites, research prepared by others, prospectuses, annual reports and filings with the SEC.

**8b: Investment Strategies**

JGC Wealth Management utilizes multiple investment strategies to meet your investment objectives. These methodologies are formulated based on a comprehensive review and assessment of your expectations,

investment time horizon, risk tolerance level, present investment allocation, and current and projected financial requirements. Our approach to asset management is based on “Modern Portfolio Theory” and other aspects of academic research that strive to capture expected returns in a cost-effective approach. By combining a market-driven process with a flexible trading strategy, we manage the tradeoffs that matter for performance—balancing competing premiums, diversification, and costs. We may also utilize Real Estate Investment Trust (“REIT”) investments for clients meeting certain requirements that are looking for current income/yield. REITs can provide income for clients, however these real estate based investments can also be relatively illiquid and may have limited marketability.

Ultimately, each strategy aims to maximize return within reasonable and prudent levels of risk. Also, the approach taken strives to provide exposure to a wide range of investment opportunities in various markets while limiting risk exposure through prudent diversification. Finally, the costs of administering and managing the investments related to the strategy cannot be excessive.

### **8c: Risk of Loss**

All investments include a risk of loss. In addition, as global and domestic economic events often indicate, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

JGC Wealth Management will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, liquidity, interest rate, political, and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by JGC Wealth Management with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any unauthorized act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

## **ITEM 9 – DISCIPLINARY INFORMATION**

### **9a: Civil or Criminal Actions**

JGC Wealth Management and its managers have never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

### **9b: Administrative Enforcement Proceedings**

JGC Wealth Management and its managers have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

### **9c: Self-Regulatory Organization Enforcement Proceedings**

JGC Wealth Management and its managers have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, JGC Wealth

Management and its managers have never been found in violation of self-regulatory agencies rules such that they were barred, suspended, limited in advisory functions or fined.

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

### **10a: Broker Dealers and Registered Representatives**

JGC Wealth Management is not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer. JGC Wealth Management does not have signatory authority on client accounts.

### **10b: Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither JGC Wealth Management nor our employees hold any of the above registrations.

### **10c: Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

The principal business of JGC Wealth Management is that of a registered investment advisor and provider of financial planning services. Some of our members may be certified public accountants (CPAs). Employees who are CPAs or hold other tax preparation professional designations may also be paid based on these services they provide. In cases where we receive additional payment, there may be a conflict of interest. At all times, you are free to choose an outside agency or firm to avoid the possibility of there being a conflict of interest.

JGC Wealth Management will disclose any material conflict of interest relating to JGC Wealth Management, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

### **10d: Selection of Other Advisors and How this Advisor is Compensated for those Selections**

JGC Wealth Management may enter directly into sub-advisory relationships with independent registered investment advisory firms (“subadvisors”) on behalf of its clients as part of our discretionary services. Prior to entering into a relationship, JGC Wealth Management performs a due diligence review of the subadvisor. This review includes, but is not limited to, the review of regulatory filings, compliance program, investment offerings, and the performance of the strategies considered. The due diligence process includes multiple conversations and may include in-person visits to the subadvisor’s place of business.

When a strategy offered through a subadvisor is appropriate for a client of JGC Wealth Management, the client will be given additional information about the subadvisor and the recommended investment strategy which may include the subadvisor’s Form ADV, Part 2A and 2B, Privacy Notice, and any other information that may be relevant or informative to the client. The client will not engage the subadvisor directly; the client’s advisory relationship remains with JGC Wealth Management as set forth in the client’s Investment Advisory agreement. Sub-advisors are paid a portion of the fee that you pay to us.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **11a: Code of Ethics Description**

JGC Wealth Management has adopted a Code of Ethics that governs a number of potential conflicts of interest we have when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you and to stress the importance of a culture of compliance. For

example, certain recommendations made by JGC Wealth Management involve conflicts of interest because they would either cause us to incur additional expense (e.g. use of third-party managers or sub-advisors) or increase the assets that our compensation is calculated on (e.g. invest assets vs. payoff debt). Despite conflicts that exist, we strive to ensure that our clients' best interests are served by working to eliminate conflicts of interest where possible and disclose any conflicts that remain.

An additional benefit of our Code of Ethics is to detect and prevent violations of securities laws, including our obligations we owe to you. JGC Wealth Management's Code of Ethics is comprehensive, is distributed to each employee at the time of hire, and annually thereafter (if there are changes). We also supplement the Code of Ethics with annual training and on-going monitoring of employee activity. A complete copy of our Code of Ethics will be supplied to you, free of charge, if you request it.

JGC Wealth Management's Code of Ethics includes the following:

- Requirements related to the confidentiality of your personal, business and financial information
- Prohibitions on insider trading (if we are in possession of material, non-public information)
- Reporting of gifts and business entertainment
- Internal tracking and reporting of employee and firm transactions
- Reporting (on an on-going and quarterly basis) all personal securities transactions (what we call "reportable securities" as mandated by regulation)
- On an annual basis, we require all employees to re-certify to our Code of Ethics, identify members of their household and any account to which they have a beneficial ownership (they "own" the account or have "authority" over the account), securities held in certificate form and all securities they own at that time
- We will always maintain full disclosure with our clients so that you can make informed decisions
- We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made

For California Residents: JGC Wealth Management adheres to the California Code of Regulations, Title 10 Section 260.238 (k), (1), (2) and (o) which prohibits investment advisors from:

(k) Failing to disclose to a client in writing before entering into or renewing an advisory agreement with that client any material conflict of interest relating to the advisor, its representatives or any requires that of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice including:

(1) Compensation arrangements connected with advisory services to clients which are in addition to compensation from such clients for such services; and

(2) Charging a client an advisory fee for rendering advice without disclosing that a commission for executing securities transactions pursuant to such advice will be received by the advisor, its representatives or its employees, or that such advisory fee is being reduced by the amount of the commission earned by the advisor, its representatives or employees for the sale of securities to the client.

(o) Making any untrue statement of a material fact or omitting a statement of material fact necessary in order to make the statements made, in light of the circumstances under which they are made, not misleading in the solicitation of advisory clients.

### **11b: Recommendations Involving Material Interests**

JGC Wealth Management nor its employees recommend or sell to clients securities in which we have a material financial interest.

### **11c: Investing Personal Money in the Same Securities as Clients**

JGC Wealth Management, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. We will buy or sell from our clients' accounts before we buy or sell from our accounts. In some cases, JGC Wealth Management, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client.

### **11 d: Trading At/Around Same Time as Clients**

We do not aggregate trades for ourselves or our employees with client transactions.

Because the situations outlined above represent actual or potential conflicts of interest to our clients, we have established policies and procedures as described in our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest.

## **ITEM 12 – BROKERAGE PRACTICES**

### **12a: Selecting Brokerage Firms**

As part of our services, JGC Wealth Management will recommend a broker-dealer. We have selected our broker-dealers based on price, reliability, speed of processing, tools and "best execution" in addition to other considerations. And while you are not required to effect transactions through any broker-dealer recommended by us, we feel we have made our selections based on a totality of benefits they offer.

To avoid creating a possible conflict of interest in recommending broker-dealers, we have established the following restrictions in order to ensure its fiduciary responsibilities:

- JGC Wealth Management adheres to our Code of Ethics as outlined in Item 11 above.
- If JGC Wealth Management receives separate compensation for transactions, we will fully disclose them.
- JGC Wealth Management emphasizes your unrestricted right to select and choose your own broker or dealer.
- JGC Wealth Management will always act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

1. JGC Wealth Management may purchase software, tools, training programs or seminar services from the broker-dealer(s) recommended to custody client assets. Additionally, broker-dealers may provide services, tools or other non-financial benefits to us as a benefit for using the broker-dealer's services. Broker-dealers may also provide access to third party vendor services at a discount. These benefits may be used to service all of our accounts, whether enrolled with a particular broker-dealer or not. Since there are no minimum number of clients or asset amounts required to receive these benefits, there are no direct incentives to guide clients to a particular broker-dealer. The first consideration when recommending broker-dealers to clients is best execution.

2. JGC Wealth Management receives no referrals from broker-dealers or third parties in exchange for using that broker-dealer or third-party.

3. JGC is not involved in direct brokerage practices and does not accept client instructions for

brokerage transactions. We do not provide investment advisory services to clients who do not use the broker-dealer we have recommended to custody client assets.

**12b: Sales Aggregation**

JGC Wealth Management is authorized to aggregate purchases and sales and other transactions made for your account with purchases and sales and other transactions in the same or similar securities or instruments for other clients of ours. When we aggregate transactions, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price obtained. Stock exchange regulations may, in certain instances, prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise you in writing of any purchase or disposition of instruments for the account with respect to any such aggregated transaction. We will direct that confirmations of any transactions effected for the account be sent, in conformity with applicable law, to you.

**ITEM 13 – REVIEW OF ACCOUNTS**

**13a: Periodic Reviews**

Accounts are reviewed by Michael Blanchard, CCO, or qualified staff members. The frequency of reviews is determined based on your investment objectives, but no less than annually. When the services of a third-party Investment Advisor is used to manage a portion or all of your investment portfolio, the third-party investment advisor also performs periodic reviews of client accounts. Together, we monitor performance to ensure its management and investment style remains aligned with your investment goals and objectives.

JGC Wealth Management’s quarterly fee process is supported by a third-party service provider. Together, they jointly verify client account balances, calculate client quarterly fees, and review account billings to verify accuracy.

Financial planning clients receive their financial plans and recommendations at the time the service is completed. Depending on the type of financial planning services we are providing per our agreement with you, we may meet quarterly, annually or less frequently with you to discuss any potential changes to your financial plan.

**13b: Review Triggers**

More frequent reviews are triggered by a change in your investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or changes in economic climate.

**13c: Regular Reports**

All investment advisory clients receive quarterly and annual written reports from JGC Wealth Management. Financial planning clients do not normally receive investment reports.

**ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

**14a: Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

JGC Wealth Management does not receive economic benefits from third parties for the advice we render

to our clients.

**14b: Compensation to Non-Advisory Personnel for Client Referrals**

JGC Wealth Management does not directly or indirectly compensate any person for client referrals.

**ITEM 15 – CUSTODY**

JGC Wealth Management clients' accounts are held by a qualified custodian and other than to withdraw advisory fees, JGC Wealth Management shall have no liability to the client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any unauthorized acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a broker-dealer. As a fiduciary, JGC Wealth Management will always act in the client's best interests and in doing so, the above does not limit or modify that duty to our clients. Custodial statements will include fees charged by JGC Wealth Management. California clients also receive a statement from us that shows our fee and its calculation. We strongly urge you to review and/or compare the statement(s) for accuracy.

Clients can grant JGC Wealth Management the limited power via a Standing Letter of Authorization ("SLOA") to the account custodian to transfer client funds between the account custodian and a third party such as the client's bank. Under this limited authorization, JGC Wealth Management is deemed to have custody. Under such circumstances, our firm will follow regulatory guidance in documenting this procedure.

**ITEM 16 – INVESTMENT DISCRETION**

JGC Wealth Management asks our clients to give us discretionary authority to execute transactions without our client's prior approval. These transactions may include the purchase and selling of securities, arranging for payments or generally acting on behalf of our clients in most matters necessary to the handling of the account.

**ITEM 17 – VOTING CLIENT SECURITIES**

The clients of JGC Wealth Management retain the authority to proxy vote and will continue to do so until we otherwise may agree in writing. You should ensure that proxy ballots are mailed directly to you by selecting this option on your custodial application forms. You are welcome to delegate said proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate custodial form.

**ITEM 18 – FINANCIAL INFORMATION**

**18a: Balance Sheet**

JGC Wealth Management does not solicit prepayment of more than \$500 in fees per client six (6) months in advance.

**18b: Financial Conditions**

JGC Wealth Management has no financial issues that could impair our ability to carry out our fiduciary

duty to our clients.

**18c: Bankruptcy Petition**

JGC Wealth Management has never been the subject of a bankruptcy petition.

**ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

**19a&b. Principal Executive Officers: Education, Background & Other Businesses**

JGC Wealth Management’s executive officers are Michael Blanchard, Larry Glaze, and Joshua Morrow. Their education and business background information can be found in the following supplemental Part B brochures.

**19c. How Performance Based Fees are Calculated and Degree of Risk to Clients**

As stated above, JGC Wealth Management 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.

**19d. Material Disciplinary Disclosures for Management Persons of this Firm**

Other than disclosures made in Item 9 above, neither JGC Wealth Management nor our employees have been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding.

**19e. Material Relationships Management Persons Have With Issuers of Securities**

Neither JGC Wealth Management nor our employees have any relevant material relationships with issuers of securities.



# MICHAEL A. BLANCHARD - PART 2B

## ITEM 1 – COVER PAGE ADV PART 2 B BROCHURE

This supplemental information is about Michael A. Blanchard of JGC Wealth Management, LLC (“JGC Wealth Management”). Additional information about JGC Wealth Management is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### **Michael A. Blanchard, CPA, CFP®**

Year Born: 1971

CRD# 5477575

### **Educational Background**

B.S. Accounting – Linfield College (2005)

A.T.A. Management – Olympic College  
(1998)

### **Business Background**

11/2012 – Present: Managing Member, Chief Compliance Officer & Advisor, JGC  
Wealth Management, LLC

01/2007 – Present: Accountant & Shareholder, Johnson, Glaze & Co., PC

05/2008 – 12/2012: Advisor Affiliate, The H Group, Inc.

01/2000 – 12/2006: Staff Accountant, Johnson, Glaze & Co., PC

### **Professional Qualifications**

Series 65, Uniform Investment Advisor Law Examination (2008)

### **Professional Designation(s):**

Certified Financial Planner (CFP®)

Certified Public Accountant (CPA)

### **CFP®: (Certified Financial Planner)**

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold a CFP® certification.

To attain the right to use the CFP® designation, 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 as of January 2007, attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;  
Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year);
- 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 ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks. This requires 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 renewal of 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.

**CPA®: (Certified Public Accountant)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public

interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

### **ITEM 3 – DISCIPLINARY INFORMATION**

Michael A. Blanchard has no legal or disciplinary events that are material to you or a prospective client's evaluation of this advisory business.

### **ITEM 4 – OTHER BUSINESS ACTIVITIES**

In addition to his role at JGC Wealth Management, Mr. Blanchard is shareholder and CPA at Johnson, Glaze & Co., PC ("Johnson Glaze"). Johnson Glaze is a full-service CPA firm with services including taxes, financial services, management services, and consulting. In this capacity, Mr. Blanchard may receive compensation from an advisory client who also becomes a client of Johnson Glaze.

Mr. Blanchard is a member of MBA Real Estate, LLC. The business of this entity is real estate investment. Members of MBA Real Estate, LLC include another JGC Wealth Management adviser as well as JGC Wealth Management clients. Mr. Blanchard's involvement in MBA Real Estate, LLC with clients of JGC Wealth Management creates a conflict of interest. To mitigate this conflict, Mr. Blanchard will refrain from providing clients advice regarding MBA Real Estate, LLC as a part of JGC Wealth Management advisory services. JGC Wealth Management clients are advised to seek independent guidance regarding MBA Real Estate, LLC.

### **ITEM 5 – ADDITIONAL COMPENSATION**

Other than work with JGC Wealth Management, Johnson Glaze and any disclosures made in Items 2 and 4 above, Michael A. Blanchard receives no additional compensation related to outside business activities.

### **ITEM 6 – SUPERVISION**

Michael A. Blanchard is the Chief Compliance Officer and a supervising member of the firm along with Joshua Morrow. As such, Mr. Blanchard is not supervised in the traditional sense, but works closely with the other partner(s) in the firm. All supervising members remain aware of and keep us in compliance with the current rules and regulations put forth by each ruling regulatory authority where we conduct our business. JGC Wealth Management has established internal policies for the guidance of its trading personnel. Transactions, which vary from the guidelines, are subject to periodic supervisory review. These guidelines are reviewed annually and periodically adjusted.

### **ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

Other than any disclosures made in Item 3 above, Michael A. Blanchard has not been found liable in any additional material arbitration or liable in a civil, self-regulatory organization, or administrative proceeding involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Michael A. Blanchard has never been the subject of a bankruptcy petition.

# JOSHUA D. MORROW - PART 2B

## ITEM 1 – COVER PAGE ADV PART 2 B BROCHURE

This supplemental information is about Joshua D. Morrow of JGC Wealth Management, LLC (“JGC Wealth Management”). Additional information about JGC Wealth Management is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### **Joshua D. Morrow, CPA, CTFA**

Year Born: 1977  
CRD# 6992203

### **Educational Background**

B.A. Business Administration – Western Oregon University (2008)

### **Business Background**

01/2019 – Present: Member & Investment Advisor Representative, JGC Wealth Management, LLC  
11/2015 – Present: Accountant & Shareholder, Johnson, Glaze & Co., PC  
04/2014 – 11/2015: CPA Manager, AKT, LLP  
01/2007 – 04/2014: CPA Manager, Boldt, Carlisle & Smith, LLC

### **Professional Designation(s)**

Certified Public Accountant (CPA)  
Certified Trust and Fiduciary Advisor (CTFA)

### **CPA®: (Certified Public Accountant)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

**CTFA: (Certified Trust and Fiduciary Advisor)**

Issued by the ABA Institute of Certified Bankers, the CTFA certification demonstrates the certificant's expertise in the wealth and trust field.

Candidates must meet the following requirements:

- Prerequisites:
  - Ten (10) or more years of experience in wealth management; or
  - Five (5) years minimum experience in wealth management AND a bachelor's degree; or
  - Three (3) years minimum experience in wealth management AND completion of a wealth management training program.
- Education: None
- Exam: Final certification exam
- Continuing Education: 45 credits every three years with a minimum of six hours in each of four knowledge areas

**ITEM 3 – DISCIPLINARY INFORMATION**

Joshua D. Morrow has no legal or disciplinary events that are material to you or a prospective client's evaluation of this advisory business.

**ITEM 4 – OTHER BUSINESS ACTIVITIES**

In addition to his role at JGC Wealth Management, Joshua D. Morrow is a shareholder of Johnson, Glaze & Co., PC ("Johnson Glaze"). Johnson Glaze is a full-service CPA firm with services including taxes, financial services, management services, and consulting. In this capacity, Mr. Morrow may receive compensation from an advisory client who also becomes a client of Johnson Glaze.

Mr. Morrow is a member of MBA Real Estate, LLC. The business of this entity is real estate investment. Members of MBA Real Estate, LLC include another JGC Wealth Management adviser as well as JGC Wealth Management clients. Mr. Morrow's involvement in MBA Real Estate, LLC with clients of JGC Wealth Management creates a conflict of interest. To mitigate this conflict, Mr. Morrow will refrain from providing clients advice regarding MBA Real Estate, LLC as a part of JGC Wealth Management advisory services. JGC Wealth Management clients are advised to seek independent guidance regarding MBA Real Estate, LLC.

**ITEM 5 – ADDITIONAL COMPENSATION**

Other than work with JGC Wealth Management, Johnson Glaze and any disclosures made in Items 2 and 4

above, Joshua D. Morrow receives no additional compensation related to outside business activities.

**ITEM 6 – SUPERVISION**

Joshua D. Morrow is a supervising member of the firm along with Michael Blanchard. As such, Joshua D. Morrow is not supervised in the traditional sense, but works closely with the other partner(s) in the firm. All supervising members remain aware of and keep us in compliance with the current rules and regulations put forth by each ruling regulatory authority where we conduct our business. JGC Wealth Management has established internal policies for the guidance of its trading personnel. Transactions, which vary from the guidelines, are subject to periodic supervisory review. These guidelines are reviewed annually and periodically adjusted.

**ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

Other than any disclosures made in Item 3 above, Joshua D. Morrow has not been found liable in any additional material arbitration or liable in a civil, self-regulatory organization, or administrative proceeding involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Joshua D. Morrow has never been the subject of a bankruptcy petition.

# KATIE M. FALLIN - PART 2B

## ITEM 1 – COVER PAGE ADV PART 2 B BROCHURE

This supplemental information is about Katie M. Fallin of JGC Wealth Management, LLC (“JGC Wealth Management”). Additional information about JGC Wealth Management is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### **Katie M. Fallin**

Year Born: 1979

CRD# 6838242

### **Educational Background**

B.S. Accounting – Linfield College (2015)

### **Business Background**

02/2019 – Present: Investment Advisor Representative, JGC Wealth Management, LLC

01/2015 – Present: Accountant, Johnson, Glaze & Co., PC

06/2016 – 02/2019: Client Service Associate, JGC Wealth Management, LLC

## ITEM 3 – DISCIPLINARY INFORMATION

Katie M. Fallin has no legal or disciplinary events that are material to you or a prospective client’s evaluation of this advisory business.

## ITEM 4 – OTHER BUSINESS ACTIVITIES

In addition to her role at JGC Wealth Management, Katie M. Fallin is an accountant at Johnson, Glaze & Co., PC (“Johnson Glaze”). Johnson Glaze is a full-service CPA firm with services including taxes, financial services, management services, and consulting. In this capacity, Mrs. Fallin may receive compensation from an advisory client who also becomes a client of Johnson Glaze.

## ITEM 5 – ADDITIONAL COMPENSATION

Other than work with JGC Wealth Management, Johnson Glaze and any disclosures made in Items 2 and 4 above, Katie M. Fallin receives no additional compensation related to outside business activities.

## ITEM 6 – SUPERVISION

Katie M. Fallin is supervised by Michael Blanchard and Joshua Morrow. Together Mr. Blanchard and Mr. Morrow oversee and supervise all members of the firm and are responsible for the firm’s compliance with

the current rules and regulations put forth by each ruling regulatory authority where we conduct our business. JGC Wealth Management has established internal policies for the guidance of its trading personnel. Transactions, which vary from the guidelines, are subject to periodic supervisory review. These guidelines are reviewed yearly and periodically adjusted.

**ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

Other than any disclosures made in Item 3 above, Katie M. Fallin has not been found liable in any additional material arbitration or liable in a civil, self-regulatory organization, or administrative proceeding involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Katie M. Fallin has never been the subject of a bankruptcy petition.



# REBEKAH “BECKY” ADAMS - PART 2B

## ITEM 1 – COVER PAGE ADV PART 2 B BROCHURE

This supplemental information is about Becky Adams of JGC Wealth Management, LLC (“JGC Wealth Management”). Additional information about JGC Wealth Management is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### Becky Adams

Year Born: 1997

CRD# 7419249

### Educational Background

B.S. Business Management & Accounting – Corban University (2019)

### Business Background

12/2021 – Present: Investment Advisor Representative, JGC Wealth Management, LLC

05/2019 – Present: Client Services Associate, JGC Wealth Management, LLC

05/2019 – Present: Staff Accountant, Johnson, Glaze & Co., PC

## ITEM 3 – DISCIPLINARY INFORMATION

Becky Adams has no legal or disciplinary events that are material to you or a prospective client’s evaluation of this advisory business.

## ITEM 4 – OTHER BUSINESS ACTIVITIES

In addition to her role at JGC Wealth Management, Becky Adams is a staff accountant at Johnson, Glaze & Co., PC (“Johnson Glaze”). Johnson Glaze is a full-service CPA firm with services including taxes, financial services, management services, and consulting. In this capacity, Ms. Adams may receive compensation from an advisory client who also becomes a client of Johnson Glaze.

## ITEM 5 – ADDITIONAL COMPENSATION

Other than work with JGC Wealth Management, Johnson Glaze and any disclosures made in Items 2 and 4 above, Becky Adams receives no additional compensation related to outside business activities.

## ITEM 6 – SUPERVISION

Becky Adams is supervised by Michael Blanchard and Joshua Morrow. Together Mr. Blanchard and Mr. Morrow oversee and supervise all members of the firm and are responsible for the firm’s compliance with

the current rules and regulations put forth by each ruling regulatory authority where we conduct our business. JGC Wealth Management has established internal policies for the guidance of its trading personnel. Transactions, which vary from the guidelines, are subject to periodic supervisory review. These guidelines are reviewed yearly and periodically adjusted.

**ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

Other than any disclosures made in Item 3 above, Becky Adams has not been found liable in any additional material arbitration or liable in a civil, self-regulatory organization, or administrative proceeding involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Becky Adams has never been the subject of a bankruptcy petition.

# PAUL CRAMER - PART 2B

## ITEM 1 – COVER PAGE ADV PART 2 B BROCHURE

This supplemental information is about Paul Cramer of JGC Wealth Management, LLC (“JGC Wealth Management”). Additional information about JGC Wealth Management is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### **Paul Cramer, CPA**

Year Born: 1957

CRD# 4700593

### **Educational Background**

B.S. Business Administration – Oregon State University (1990)

### **Business Background**

12/2021 – Present: Investment Advisor Representative, JGC Wealth Management, LLC

12/2021 – Present: Tax Manager, Johnson, Glaze & Co., PC

01/2011 – 12/2021: Tax Preparation/Accountant, Tax & Wealth Management, LLP

11/2008 – 12/2021: Insurance Agent, Avantax Insurance Agency, LLC

08/2004 – 12/2021: Investment Adviser Representative, Avantax Advisory Services

05/2003 – 12/2021: Registered Representative, Avantax Investment Services, Inc.

08/2000 – 12/2021: CPA, Witzke & Mendenhall

06/1990 – 08/2000: CPA, Koontz & Perdue

### **Professional Designation(s)**

Certified Public Accountant (CPA)

### **CPA®: (Certified Public Accountant)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

**ITEM 3 – DISCIPLINARY INFORMATION**

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

**ITEM 4 – OTHER BUSINESS ACTIVITIES**

In addition to her role at JGC Wealth Management, Paul Cramer is a Tax Manager at Johnson, Glaze & Co., PC ("Johnson Glaze"). Johnson Glaze is a full-service CPA firm with services including taxes, financial services, management services, and consulting. In this capacity, Mr. Cramer may receive compensation from an advisory client who also becomes a client of Johnson Glaze.

**ITEM 5 – ADDITIONAL COMPENSATION**

Other than work with JGC Wealth Management, Johnson Glaze and any disclosures made in Items 2 and 4 above, Paul Cramer receives no additional compensation related to outside business activities.

**ITEM 6 – SUPERVISION**

Paul Cramer is supervised by Michael Blanchard and Joshua Morrow. Together Mr. Blanchard and Mr. Morrow oversee and supervise all members of the firm and are responsible for the firm's compliance with the current rules and regulations put forth by each ruling regulatory authority where we conduct our business. JGC Wealth Management has established internal policies for the guidance of its trading personnel. Transactions, which vary from the guidelines, are subject to periodic supervisory review. These guidelines are reviewed yearly and periodically adjusted.

**ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

Other than any disclosures made in Item 3 above, Paul Cramer has not been found liable in any additional material arbitration or liable in a civil, self-regulatory organization, or administrative proceeding involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Paul Cramer has never been the subject of a bankruptcy petition.