

ITEM 1. COVER PAGE



5950 Sherry Lane, Suite 600
Dallas, Texas 75225
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www.rgtadvisors.com

May 9, 2022

Form ADV Part 2B | Brochure Supplement

This brochure supplement provides information about the supervised persons of RGT Wealth Advisors, LLC, DBA RGT Wealth Advisors (RGT or we), and supplements RGT's brochure. You should have received a copy of that brochure. Please contact Heather Pesikoff, Chief Compliance Officer, at 214.360.7000 or hpesikoff@rgtadvisors.com if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about RGT's supervised persons is available on the SEC's website at www.adviserinfo.sec.gov.

TODD R. AMACHER

Managing Director
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Amacher was born in 1968. He joined RGT Wealth Advisors in 2004 as a director and a member of the financial planning team. He has been a managing director since 2009. Mr. Amacher holds a Bachelor of Science from Texas A&M University (1990), as well as an MBA (1995) and a Juris Doctor (1995), both from Baylor University. Currently, Mr. Amacher is employed by CIPW Service Co. with a service agreement.

Mr. Amacher is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

RGT’s Form ADV Part 2A provides a detailed accounting of the events surrounding RGT’s February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan’s actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Amacher, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons’ claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties’ Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Amacher is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Amacher. In addition, Mr. Amacher must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Amacher), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

BRENT ANDERSON

Senior Director
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Anderson was born in 1985. He joined RGT Wealth Advisors in 2008 and is a senior director and a member of the investment team. Mr. Anderson holds a Bachelor of Business Administration from the University of Texas (2008).

Mr. Anderson is a CFA[®] Charterholder. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 178,000 CFA[®] Charterholders working in over 170 countries and regions. To earn the CFA[®] charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA[®] Charterholders to:

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA[®] charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA[®] Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA[®] charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

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

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

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

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ITEM 5. ADDITIONAL COMPENSATION

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Matt Krauss, a Managing Director and the Chief Investment Officer, is responsible for supervising the advisory activities of all investment personnel, including Mr. Anderson. In addition, Mr. Anderson must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Anderson), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

JESSICA BOGHETICH

Senior Director
RGT Wealth Advisors
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Dallas, Texas 75225
214.360.7000
jboghetich@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Boghetich was born in 1986. She joined RGT Wealth Advisors in 2013 and is a senior director and a member of the financial planning team. She was previously employed, in various capacities, by Tolleson Wealth Management (2007–2013). Ms. Boghetich holds a Bachelor Business Administration in Finance (2008) and a Bachelor of Science in Political Science (2008), both from Southern Methodist University.

Ms. Boghetich is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

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GREGORY T. BONE

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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Bone was born in 1965. He joined RGT Wealth Advisors in 2002 as a director and a member of the investment team. Mr. Bone has been a managing director since 2011. He holds a Bachelor of Arts in Economics from Hendrix College (1987) and a Master of Arts in Economics from Southern Methodist University (1989). Currently, Mr. Bone is employed by CIPW Service Co. with a service agreement.

Mr. Bone is a CFA[®] Charterholder. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

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High Ethical Standards

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- Maintain independence and objectivity
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Comprehensive and Current Knowledge

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

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RGT's Form ADV Part 2A provides a detailed accounting of the events surrounding RGT's February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan's actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Bone, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons' claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties' Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Bone is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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BRIAN CLOUD

Managing Director
RGT Wealth Advisors
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Dallas, Texas 75225
214.360.7000
bcloud@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Cloud was born in 1985. He joined RGT Wealth Advisors in 2012 and is a managing director and a member of the financial planning team. Mr. Cloud holds a Bachelor of Business Administration in Management and General Business from Texas Tech University (2009) and a Master of Science in Personal Financial Planning (2012) from Texas Tech University. Currently, Mr. Cloud is employed by CIPW Service Co. with a service agreement.

Mr. Cloud is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

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MATTHEW G. COVELLI

Senior Financial Planner
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214.360.7000
mcovelli@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Covelli was born in 1989. He joined RGT Wealth Advisors in 2016 and is currently a Senior Financial Planner. Mr. Covelli graduated from Texas Tech University with a Bachelor of Science degree in personal financial planning (2013) and a Master of Science degree in personal financial planning (2013).

Mr. Covelli is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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Not applicable.

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ITEM 6. SUPERVISION

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Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Covelli. In addition, Mr. Covelli must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Covelli), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

ADAM GOLDENBERG

Managing Director
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agoldenberg@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Goldenberg was born in 1975. He joined RGT Wealth Advisors in 2015 as a senior director and a member of the financial planning team. He became a managing director in January 2019. Prior to joining RGT, Mr. Goldenberg was an investment advisor representative with True North Advisors (2007–2015). Previously, Mr. Goldenberg was a registered representative with American Securities Group (2007) and a financial advisor with Merrill Lynch (2005–2007). Mr. Goldenberg holds a Bachelor of Business Administration in Accounting from Texas A&M University (1997) and an MBA from Rice University (2001). Currently, Mr. Goldenberg is employed by CIPW Service Co. with a service agreement.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Goldenberg is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Goldenberg. In addition, Mr. Goldenberg must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather

Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Goldenberg), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

MARK C. GRIEGE

Managing Director
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mgriega@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Griega was born in 1959. He co-founded RGT Wealth Advisors in 1986 and has served as a managing director since that time. Mr. Griega serves as RGT's Chief Executive Officer and holds a Bachelor of Business Administration from Southern Methodist University (1981) and a Juris Doctor from the University of Texas School of Law (1985). Currently, Mr. Griega is employed by CIPW Service Co. with a service agreement.

ITEM 3. DISCIPLINARY INFORMATION

RGT's Form ADV Part 2A provides a detailed accounting of the events surrounding RGT's February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan's actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

On June 30, 2016, former RGT clients, David Rosenblatt and Shari Gersten, initiated an arbitration proceeding against RGT and certain of its partners and officers, including Mr. Griega, with the Financial Industry Regulatory Agency related to Narayan's and Bae's actions in connection with the Subject Investments (FINRA# 16-01915). On March 29, 2017, RGT reached a full settlement with the Rosenblatts for the dismissal with prejudice of all claims asserted in this arbitration.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Griega, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons' claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties' Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Griega is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates, other than those listed below:

VERITEX BANK

Lead Independent Director of the Board of Directors

Veritex Community Bank is one of several banks that RGT recommends to clients seeking banking services. This creates a potential conflict of interest with RGT clients who bank with Veritex because Mr. Griege has an indirect financial interest in the success of Veritex. RGT discloses this affiliation and the potential conflict of interest, to its clients.

Mr. Griege receives compensation for his service as a board member of Veritex Bank.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

RGT's Board of Managers is responsible for supervising the advisory activities of Mr. Griege. In addition, Mr. Griege must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Griege), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

CASSANDRA GUERRERO

Senior Director
RGT Wealth Advisors
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Dallas, Texas 75225
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Guerrero was born in 1988. She joined RGT Wealth Advisors in 2018 and is a senior director and a member of the financial planning team. She was previously employed, in various capacities, by True North Advisors (2012–2018). Ms. Guerrero holds a Bachelor Business Administration in Finance and Real Estate (2010) and a Master of Science in Personal Financial Planning (2012), both from Texas Tech University.

Ms. Guerrero is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Ms. Guerrero is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT’s Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT’s investment team is ultimately subject to the approval of RGT’s Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Ms. Guerrero. In addition, Ms. Guerrero must comply with RGT’s compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT’s compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT’s Chief Compliance Officer and is responsible for supervising each of RGT’s personnel (including, without limitation, Ms. Guerrero), in accordance with RGT’s policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

KRISTA HINTON

Senior Director
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Hinton was born in 1982. She joined RGT Wealth Advisors in 2008 and is a senior director and a member of the financial planning team. She was previously a senior accountant with Accuro Healthcare Solutions (2008) and a senior associate with PricewaterhouseCoopers (2005–2008). Ms. Hinton holds a Bachelor of Science in Accounting (2004) and a Master of Science in Accounting (2004), both from Bradley University.

Ms. Hinton is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Ms. Hinton is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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ITEM 6. SUPERVISION

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Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Ms. Hinton. In addition, Ms. Hinton must comply with RGT’s compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT’s compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT’s Chief Compliance Officer and is responsible for supervising each of RGT’s personnel (including, without limitation, Ms. Hinton), in accordance with RGT’s policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

JEREMY HUDSON

Managing Director
RGT Wealth Advisors
5950 Sherry Lane, Suite 600
Dallas, Texas 75225
214.360.7000
jhudson@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Hudson was born in 1977. He joined RGT Wealth Advisors in 2013 as a director and a member of the financial planning team. He has been a managing director since 2016. Prior to joining RGT, Mr. Hudson was a director of financial planning with Howard Financial Services, Ltd. (2006–2012). Previously, he was a senior financial planner with Wealth Builders, Inc. (2000–2005). Mr. Hudson holds a Bachelor of Science in Family Financial Planning from Texas Tech University (2000). Currently, Mr. Hudson is employed by CIPW Service Co. with a service agreement.

Mr. Hudson is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

RGT’s Form ADV Part 2A provides a detailed accounting of the events surrounding RGT’s February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan’s actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Hudson, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons’ claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties’ Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Hudson is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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ITEM 6. SUPERVISION

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Mr. Hudson must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Hudson), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

JOANNA JADLOW

Managing Director
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jjadlow@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Jadlow was born in 1977. She joined RGT Wealth Advisors in 2005. She is a member of the financial planning team and has been a managing director since 2015. Previously, Ms. Jadlow served RGT as a director (2011–2014) and a financial planner (2005–2010). Ms. Jadlow holds a Bachelor of Business Administration in Business Honors and Accounting (2001) and a Master in Professional Accounting (2001), both from the University of Texas at Austin. Currently, Ms. Jadlow is employed by CIPW Service Co. with a service agreement.

Ms. Jadlow is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

RGT’s Form ADV Part 2A provides a detailed accounting of the events surrounding RGT’s February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan’s actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Ms. Jadow, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons’ claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties’ Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Ms. Jadow is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Ms. Jadow. In addition, Ms. Jadow must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Ms. Jadow), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

MATTHEW J. KRAUSS

Managing Director
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214.360.7000
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Krauss was born in 1980. He joined RGT Wealth Advisors in 2010 and is a managing director and serves as RGT's Chief Investment Officer. Prior to joining RGT, Mr. Krauss was an analyst/trader at Falcon Fund (2003–2010). He holds a Bachelor of Science in Economics from Duke University (2002). Currently, Mr. Krauss is employed by CIPW Service Co. with a service agreement.

Mr. Krauss is a CFA[®] Charterholder. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 178,000 CFA[®] Charterholders working in over 170 countries and regions. To earn the CFA[®] charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA[®] Charterholders to:

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA[®] charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA[®] Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA[®] charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

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

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

ITEM 3. DISCIPLINARY INFORMATION

RGT's Form ADV Part 2A provides a detailed accounting of the events surrounding RGT's February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan's actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Krauss, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons' claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties' Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Krauss is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Mark Griege, a Managing Director and RGT's Chief Executive Officer, is responsible for supervising the advisory activities of Mr. Krauss. In addition, Mr. Krauss must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Krauss), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

BRENT W. LITTLE

Managing Director
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214.360.7000
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Little was born in 1973. He joined RGT Wealth Advisors in 2021 and is a Managing Director. He was previously employed by Odyssey Wealth Management, LLC (2006–2021). Mr. Little holds Bachelor of Arts degrees in Management (1997) and Accounting/Finance (2000) as well as a Master of Accounting degree (2000) from Texas Christian University. Currently, Mr. Little is employed by CIPW Service Co. with a service agreement.

Mr. Little is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Little has held the designation of Personal Financial Specialist (“PFS”) since 2004. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, certificate, or permit, none of which are in inactive status; fulfill 3,000 hours of personal financial planning business experience; complete 75 hours of personal financial planning CPE credits; pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA’s *Code of Professional Conduct* and the *Statement on Standards in Personal Financial Planning Services*, when providing personal financial planning services. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

Mr. Little has held the designation of Certified Public Accountant (“CPA”) since 2001. 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. In addition to the *Code of Professional Conduct*, AICPA members who provide personal financial

planning services are required to follow the *Statement on Standards in Personal Financial Planning Services* (SSPFPS).

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Little is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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ITEM 6. SUPERVISION

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Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Little. In addition, Mr. Little must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Little), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

LAURA MAXFIELD

Director
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lmaxfield@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Maxfield was born in 1985. She joined RGT Wealth Advisors in 2019 and is a director and a member of the financial planning team. She was previously employed, in various capacities, by Lee Financial. Ms. Maxfield holds a Bachelor of Business Administration from Baylor University.

Ms. Maxfield is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Ms. Maxfield is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

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Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Ms. Maxfield. In addition, Ms. Maxfield must comply with RGT’s compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT’s compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT’s Chief Compliance Officer and is responsible for supervising each of RGT’s personnel (including, without limitation, Ms. Maxfield), in accordance with RGT’s policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

K. MARK McCLANAHAN

Managing Director
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. McClanahan was born in 1960. He joined RGT Wealth Advisors in 2008 as a director and a member of the financial planning team. Mr. McClanahan has been a managing director since 2013. He holds a Bachelor of Science from the University of Kansas (1982). Currently, Mr. McClanahan is employed by CIPW Service Co. with a service agreement.

Mr. McClanahan is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. McClanahan holds the designation of Chartered Financial Consultant (ChFC®). The ChFC® designation has been a mark of excellence for forty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

ITEM 3. DISCIPLINARY INFORMATION

RGT’s Form ADV Part 2A provides a detailed accounting of the events surrounding RGT’s February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan’s actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. McClanahan, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons’ claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties’ Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. McClanahan is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. McClanahan. In addition, Mr. McClanahan must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. McClanahan), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

KELLY G. MILLS
Senior Financial Planner
RGT Wealth Advisors
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Dallas, Texas 75225
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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Mills was born in 1982. She joined RGT Wealth Advisors in 2017 and is currently a Senior Financial Planner. Ms. Mills graduated from Wake Forest University with a Bachelor of Arts degree (2004).

Ms. Mills is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
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ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Ms. Mills is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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KELVIN M. MURPHY, JR.

Director
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Dallas, Texas 75225
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kmurphy@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Murphy was born in 1989. He joined RGT Wealth Advisors in 2015 and is currently a Director. Mr. Murphy graduated from Campbell University with a Bachelor of Business Administration degree (2012) and a Master of Business Administration degree (2012).

Mr. Murphy is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Murphy is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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STEVE NOVAK

Managing Director
RGT Wealth Advisors
5950 Sherry Lane, Suite 600
Dallas, Texas 75225
214.360.7000
snovak@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Novak was born in 1973. He joined RGT Wealth Advisors in 2021 and is a managing director and a member of the financial planning team. Prior to joining RGT, he served as an Executive Director with Morgan Stanley's Family Office Resources (2019-2021) and as a Managing Partner of The Blum Firm, PC in Dallas, Texas (2006-2018). Mr. Novak holds a Bachelor of General Studies in Political Science (1997) and a Juris Doctor (2001) from the University of Kansas. Currently, Mr. Novak is employed by CIPW Service Co. with a service agreement.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Novak is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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RGT's personnel (including, without limitation, Mr. Novak), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

DANA PINGENOT

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ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ms. Pingenot was born in 1965. She joined RGT Wealth Advisors in 2020 and is a managing director and a member of the financial planning team. She was previously employed, in various capacities, by Lee Financial (1991–2020). Ms. Pingenot holds a Bachelor of Business Administration in Finance (1987) from Baylor University. Currently, Ms. Pingenot is employed by CIPW Service Co. with a service agreement.

Ms. Pingenot is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Ms. Pingnot is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT’s Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT’s investment team is ultimately subject to the approval of RGT’s Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Ms. Pingnot. In addition, Ms. Pingnot must comply with RGT’s compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT’s compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT’s Chief Compliance Officer and is responsible for supervising each of RGT’s personnel (including, without limitation, Ms. Pingnot), in accordance with RGT’s policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

MICHAEL J. SHOCKLEY

Managing Director
RGT Wealth Advisors
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Dallas, Texas 75225
214.360.7000
mshockley@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Shockley was born in 1966. He joined RGT Wealth Advisors in 1999 as a director and a member of the financial planning team. Mr. Shockley has been a managing director since 2011. He holds a Bachelor of Business Administration (1988) and an MBA (1992), both from Loyola Marymount University, as well as a Juris Doctor from Loyola Law School (1996). Currently, Mr. Shockley is employed by CIPW Service Co. with a service agreement.

Mr. Shockley is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3. DISCIPLINARY INFORMATION

RGT’s Form ADV Part 2A provides a detailed accounting of the events surrounding RGT’s February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan’s actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Shockley, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons’ claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties’ Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Shockley is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates, other than those listed below:

NATIONAL ADVISORS TRUST COMPANY, FSB
Advisory Council Member

RGT has established a relationship with National Advisors Trust Company, FSB (NAT) to provide trust services to RGT's clients. Though our clients are under no obligation to utilize the services of NAT, we recommend their services to clients in need of trust services. RGT purchased less than

one percent (1%) ownership interest in National Advisors Holdings, Inc. (NAH), the parent of NAT. Though to date RGT has not received any compensation from NAH or NAT, as a shareholder of NAH, RGT may benefit by realizing a profit in the form of dividends or other corporate distributions from NAH, in addition to any investment management fees already paid to RGT. Such affiliation and potential conflict of interest are disclosed to clients in any trust agreement between a client and NAT.

Mr. Shockley receives no compensation for his service as an advisory council member of NAT.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Shockley. In addition, Mr. Shockley must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Shockley), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

JAMES S. (CHIP) TARDY, JR.

Managing Director
RGT Wealth Advisors
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214.360.7000
ctardy@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Tardy was born in 1962. He joined RGT Wealth Advisors in 2016 as a managing director. Prior to joining RGT, Mr. Tardy served as director of private banking with Credit Suisse Securities, LLC (2000–2016). Previously, he was a vice president with Donaldson, Lufkin & Jenrette Securities Corporation (1994–2000). Mr. Tardy holds a Bachelor of Business Administration from the University of Georgia (1985) and an MBA from Northwestern University Kellogg School of Management (1994). Currently, Mr. Tardy is employed by CIPW Service Co. with a service agreement.

ITEM 3. DISCIPLINARY INFORMATION

RGT's Form ADV Part 2A provides a detailed accounting of the events surrounding RGT's February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan's actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Tardy, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons' claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties' Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Tardy is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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ITEM 6. SUPERVISION

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Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Tardy. In addition, Mr. Tardy must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Tardy), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

CHARLES E. THOELE

Managing Director
RGT Wealth Advisors
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Dallas, Texas 75225
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cthoele@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Thoele was born in 1958. He joined RGT Wealth Advisors in 1991 and is a managing director and member of the investment team. Mr. Thoele holds a Bachelor of Science from Indiana University (1980) and a Master of Science from the University of Texas at Arlington (1988). Currently, Mr. Thoele is employed by CIPW Service Co. with a service agreement.

Mr. Thoele is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Thoele is a CFA® Charterholder. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 178,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

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

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today’s quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the

investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

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

ITEM 3. DISCIPLINARY INFORMATION

RGT's Form ADV Part 2A provides a detailed accounting of the events surrounding RGT's February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan's actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

On June 30, 2016, former RGT clients, David Rosenblatt and Shari Gersten, initiated an arbitration proceeding against RGT and certain of its partners and officers, including Mr. Thoele, with the Financial Industry Regulatory Agency related to Narayan's and Bae's actions in connection with the Subject Investments (FINRA# 16-01915). On March 29, 2017, RGT reached a full settlement with the Rosenblatts for the dismissal with prejudice of all claims asserted in this arbitration.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Thoele, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons' claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties' Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Thoele is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Matt Krauss, a Managing Director and the Chief Investment Officer, is responsible for supervising the advisory activities of all investment personnel, including Mr. Thoele. In addition, Mr. Thoele must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff also serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Thoele), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

C. PRICE WAGNER

Managing Director
RGT Wealth Advisors
5950 Sherry Lane, Suite 600
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214.360.7000
pwagner@rgtadvisors.com

ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Wagner was born in 1969. He joined RGT Wealth Advisors in 2021 and is a Managing Director. He was previously employed by Lincoln Property Company (2005–2021) as Senior Vice President. Mr. Wagner holds a Bachelor of Science degree in Economics (1992) from Texas A&M University and a Master of Business Administration degree (1996) from The University of Texas at Austin. Currently, Mr. Wagner is employed by CIPW Service Co. with a service agreement.

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Wagner is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Wagner. In addition, Mr. Wagner must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Wagner), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

TIMOTHY M. WEBER

Managing Director
RGT Wealth Advisors
5950 Sherry Lane, Suite 600
Dallas, Texas 75225
214.360.7000
tweber@rgtadvisors.com



ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Weber was born in 1964. He joined RGT Wealth Advisors in 2012 and is a managing director. Prior to joining RGT, Mr. Weber served as a private wealth advisor with Goldman Sachs (1992–2011). He holds a Bachelor of Arts from Yale University (1982) and an MBA from Duke University (1992). Currently, Mr. Weber is employed by CIPW Service Co. with a service agreement.

ITEM 3. DISCIPLINARY INFORMATION

RGT's Form ADV Part 2A provides a detailed accounting of the events surrounding RGT's February 2016 internal investigation into the inappropriate actions of two former partners, Narayan and Bae, and their recommendation of the Subject Investments. *Defined terms have the meaning assigned to them in the Form ADV Part 2A. Please refer to that disclosure for further information.*

RGT voluntarily disclosed to all clients about Narayan's actions and the Subject Investments. The firm has reached mutual settlements and releases with clients representing more than 99% of the money invested in the Subject Investments and continues to assist affected clients to maximize value and mitigate any losses associated with the Subject Investments.

Former RGT clients, Eric and Shanda Munson, filed two lawsuits in California Superior Court against RGT and its partners, including Mr. Weber, related to Narayan's actions in connection with the Subject Investments (LASC No. BC625770 and LASC No. BC664848). The first lawsuit, filed July 1, 2016, was stayed by Court Order and the Munsons' claims were referred to mandatory arbitration. In connection with the first-filed lawsuit, on August 1, 2017, the Munsons filed a notice of voluntary dismissal without prejudice of their claims against the RGT defendants. The second lawsuit, filed June 13, 2017, is based on the same set of facts. RGT and its partners have reached a full and final settlement with the Munsons, and the Court approved the settlement and granted the parties' Joint Motion to Dismiss on October 4, 2017.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Weber is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

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ITEM 6. SUPERVISION

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Mark Griege, a Managing Director and RGT's Chief Executive Officer, is responsible for supervising the advisory activities of Mr. Weber. In addition, Mr. Weber must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff also serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Weber), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.

TYLER J. YOUNG

Senior Financial Planner
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Dallas, Texas 75225
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tyoung@rgtadvisors.com

ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mr. Young was born in 1993. He re-joined RGT Wealth Advisors in 2021 and is a Senior Financial Planner. He was previously employed by Odyssey Wealth Management, LLC (2006–2021), RGT Wealth Advisors (2018-2020), and Happy State Bank & Trust Company (2016-2018). Mr. Young holds a Bachelor of Arts degree in Finance & Economics (2014), a Master of Science degree in Finance & Economics (2015), and a Master of Public Administration degree in Accounting (2017) from West Texas A&M University.

Mr. Young is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
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Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Young has held the designation of Certified Public Accountant (“CPA”) since 2019. 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. In addition to the *Code of Professional Conduct*, AICPA members who provide personal financial planning services are required to follow the *Statement on Standards in Personal Financial Planning Services* (SSPFPS).

Mr. Young has been a CFA® Charterholder since 2019. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 178,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join

CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA[®] Charterholders to:

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA[®] charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA[®] Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA[®] charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

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

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

ITEM 3. DISCIPLINARY INFORMATION

Not applicable.

ITEM 4. OTHER BUSINESS ACTIVITIES

Mr. Young is not actively engaged in any investment-related business or occupation, outside of RGT Wealth Advisors and its affiliates.

ITEM 5. ADDITIONAL COMPENSATION

Though we do not pay outside individuals or entities for referring clients, employees are compensated for bringing new business to RGT.

ITEM 6. SUPERVISION

RGT's Investment Committee has created a platform of recommended investments and separate account managers that are used as the basis for client portfolio construction. Thus, any investment that may be recommended to clients by a member of RGT's investment team is ultimately subject to the approval of RGT's Investment Committee.

Jeremy Hudson, the Managing Director overseeing financial planning, is responsible for supervising the advisory activities of all financial planning personnel, including Mr. Young. In addition, Mr. Young must comply with RGT's compliance policies and procedures. The compliance policies and procedures are designed to detect and prevent violations of the Investment Advisers Act of 1940, the Securities Act of 1933, and other laws as applicable to RGT. All personnel are required to comply with applicable securities laws. Appropriate disciplinary action will be taken for failure to comply with the requirements of RGT's compliance policies and procedures, as well as applicable federal, state, and local securities laws and regulations. Heather Pesikoff serves as RGT's Chief Compliance Officer and is responsible for supervising each of RGT's personnel (including, without limitation, Mr. Young), in accordance with RGT's policies and procedures. Ms. Pesikoff may be reached at 214.360.7000.