Griffin M. Kirsch

Part 2A Brochure

Disclosure Brochure

Version date: March 19, 2025

This Brochure provides information about the qualifications and business practices of GK Wealth Management LLC. If you have any questions about the contents of this Brochure, please contact us at (775) 354-6622. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

GK Wealth Management LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training. Additional information about GK Wealth Management is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for GK Wealth Management LLC is 296847.

GK Wealth Management LLC

Headquarters: 98 Winter Street Reno, NV 89503

Phone: 775.354.6622 Email: Griffin@GKWealthManagement.com

ITEM 2: Material Changes

The material changes in this brochure from the last annual amendment on 04/18/2024 of GK Wealth Management LLC are described below.

Material changes relate to GK Wealth Management LLC's policies, practices, or conflicts of interests.

- GK Wealth Management LLC has updated its Assets Under Management. (Item 4)
- GK Wealth Management LLC has updated its fees (Item 5).

The Brochure may currently be requested free of charge by contacting Griffin Kirsch at 775-354-6622 or Griffin@GKWealthManagement.com.

ITEM 3: Table of Contents

ITEM 4 – Advisory Business

This Disclosure document is being offered to you by GK Wealth Management LLC (hereinafter "GK") in connection with the investment advisory services GK provides. This ADV Part 2A discloses information about the services that are provided by GK and its Investment Advisor Representative's ("IAR") and the way those services are made available to you, the client. The firm was established by Mr. Griffin Kirsch, the firm's principal owner, in 2019.

Facebook: https://www.facebook.com/GKWealthManagement/

LinkedIn: https://www.linkedin.com/in/griffinmkirsch/

Instagram: https://www.instagram.com/gkwealthmanagement/

Website: www.GKWealthManagement.com

INVESTMENT MANAGEMENT AND SUPERVISION SERVICES

GK offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. GK creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- ➔ Investment Strategy
- ➔ Asset Allocation
- ➔ Risk Tolerance
- ➔ Personal Investment Policy
- ➔ Asset Selection
- ➔ Regular Portfolio Monitoring

GK will help in determining your portfolio composition based on your needs, your portfolio restrictions, if any, your financial goals and your risk tolerances. GK will work with you to obtain necessary information regarding your financial condition, investment objectives, liquidity requirements, risk tolerance, time horizons, and any restrictions on investing. This information enables GK to determine the portfolio best suited for your investment objectives and needs.

GK seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of GK's economic, investment or other financial interests. To meet its fiduciary obligations, GK attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, GK's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is GK's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

THIRD PARTY ASSET MANAGERS

GK provides investment advice and recommendations on the investment strategies of Third-Party Managers ("Managers" or "TPAM"). Selected Managers are evaluated by GK for client use. Our services include assisting you in identifying your investment objectives and matching personal and financial data with a select list of Managers. This service's intent is to have a selected list of high-quality third-party investment management firms from which GK selects one or more Managers to handle daily management of your account(s).

GK's IARs assist you with identifying your risk tolerance and investment objectives. IARs will recommend TPAMs in relation to your stated investment objectives and risk tolerance. You select a recommended TPAM based upon your needs. GK may act in either a "manager of managers" or "sub-adviser" capacity when it offers TPAM programs to you.

Managers selected for your investments need to meet several quantitative and qualitative criteria established by GK. Among the criteria that may be considered are the Manager's experience, assets under management, performance record, client retention, the level of client services provided, investment style, buy and sell disciplines, capitalization level, and the general investment process. Managers may take discretionary authority to determine the securities to be purchased and sold for the client.

Information collected by our firm regarding Managers is believed to be reliable and accurate, but GK does not necessarily independently review or verify it on all occasions. All performance reporting will be the responsibility of the respective Manager. Such performance reports will be provided directly to you and GK.

GK does not audit or verify that these results are calculated on a uniform or consistent basis as furnished by a Manager directly to GK or through the consulting service utilized by the Manager. However, GK does monitor the results of the Manager.

GK has entered agreements with various independent Program Managers. Under these agreements, GK offers clients various types of programs sponsored by these Managers.

All TPAMs to whom GK will refer will be licensed as investment advisors by your resident state and any applicable jurisdictions or registered investment advisors with the Securities and Exchange Commission.

MANAGER OF MANAGERS: When acting as a manager of managers for the TPAM program, your IAR assists you in selecting one or more TPAM programs believed to be suitable for you based on your stated financial situation, investment objectives, and financial goals. GK and your IAR oversee your investment with the TPAM. GK can track the performance of each investment manager and fire ineffective managers and hire replacements on your behalf. GK and your IAR are compensated for referring you to the TPAM program. This compensation generally takes the form of the TPAM sharing a percentage of the advisory fee you pay to the TPAM with GK and your IAR. As part of establishing a new account, you will receive our disclosure brochure and the TPAM's disclosure brochure.

ADVISER OR SUB-ADVISER: Under an adviser or sub-adviser relationship between GK and the sponsor of the TPAM program, we are jointly responsible for the ongoing management of the account. Your IAR is responsible for assisting you with completing the investor profile questionnaire. While each TPAM may have a different name for the questionnaire, your responses will assist your IAR with understanding your investment objectives, financial situation, risk tolerance, investment time horizon and other personal information. Based on the information you provide your IAR, they will help you determine which TPAM model or portfolio strategy is appropriate for you.

PENSION CONSULTING SERVICES

GK offers consulting services to pension or other employee benefit plans (including 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker--dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

CONSULTING SERVICES / FINANCIAL PLANNING

GK also provides clients investment advice on a more-limited basis on one-or-more isolated areas of concern such as estate planning, real estate, retirement planning, or any other specific topic. Additionally, GK may provide advice on non-securities matters in connection with the rendering of estate planning, insurance, real estate, and/or annuity advice as part of a holistic financial plan, but GK is not an attorney, agent or certified public accountant (CPA). In these cases, you may be required to select your own investment managers, broker-dealer and/or insurance companies for the implementation of consulting recommendations. If your needs include brokerage and/or other financial services, GK may recommend the use of one of several investment managers, brokers, banks, custodians, insurance companies or other financial professionals ("Firms"). You must independently evaluate these Firms before opening an account or transacting business and have the right to affect business through any firm you choose. You are under no obligation to follow the consulting advice that GK provides.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

WRITTEN ACKNOWLEDGEMENT OF FIDUCIARY STATUS

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

SERVICES LIMITED TO SPECIFIC TYPES OF INVESTMENTS

GK generally limits its investment advice to mutual funds, equities, fixed income securities, ETFs, index funds, real estate and alternative investments. GK may use other securities as well to help diversify a portfolio when applicable.

WRAP FEE PROGRAM

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

ASSETS

As of December 31, 2024, GK has $174,031,715 in discretionary assets under management and $18,178,803 in non-discretionary assets under management.

ITEM 5 - Investment Management Fees and Compensation

Annual advisory fees generally range from 0.10% to 2.00%. The fee is calculated using the value of the assets in the Account on the last business day of the prior billing period, billed quarterly in advance. GK will bill a prorated fee if funds are provided intra-quarter. These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of GK's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice. Fees are assessed on all assets under management, including securities, cash and money market balances. Margin debt balances do not reduce the value of assets under management. GK can also exclude positions for billing purposes.

GK charges a fee as compensation for providing Investment Management services on your account. These services include advisory and consulting services, trade entry, investment supervision, and other account maintenance activities. Our custodian may charge transaction costs, custodial fees, redemption fees, retirement plan, alternative assets fee and administrative fees or commissions. See Additional Fees and Expenses on page 11 for further details.

The specific advisory fees are outlined in your Investment Advisory Agreement. Fees may vary based on the size of the account, the complexity of the portfolio, the extent of activity in the account or other reasons agreed upon by GK and the Client. In certain circumstances, our fees and the timing of the fee payments may be negotiated. It is also worth noting that lower fees for comparable services may be available from other sources.

In addition, some assets (i.e., mutual funds, ETFs, alternative investments, UITs and MLPs) deposited in your account(s) may have been subject to other management and administrative fees as described in the prospectuses or agreements. These fees are independent of our fees and should be disclosed by the custodian or contained in each prospectus or agreement. You should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

GK's investment advisor representatives and supervised persons do NOT receive commissions for the sale of securities or other investment products or other transactions.

At our discretion, GK will aggregate asset amounts in accounts from the same household together to determine the advisory fee for all your accounts. GK may do this, for example, where GK also services accounts on behalf of your minor children, individual and joint accounts for a spouse, and/or other types of related accounts. This consolidation practice is designed to allow you the benefit of an increased asset total, which could potentially cause your account(s) to be assessed with a lower advisory fee based on the asset levels available in our fee schedule.

The independent qualified custodian holding your funds and securities will debit your account directly for the advisory fee and pay that fee to GK. You will provide signed authorization permitting the fees to be paid directly from your account held by the qualified custodian. See item 15 for details. At our discretion, you may pay the advisory fees by check. You are encouraged to review your account statements for accuracy.

Either GK or you may terminate the management agreement immediately upon written notice to the other party. The management fee will be prorated to the date of termination, for the quarter or month in which the cancellation notice was given and refunded or billed to you. Upon termination, you are responsible for monitoring the securities in your account, and GK will have no further obligation to act or advise with respect to those assets.

RETIREMENT PLAN ADVISORY SERVICE FEE

For Retirement Plan Advisory Services compensation, GK charges an annual advisory fee as negotiated with the client and disclosed in the Investment Advisory Agreement. The compensation method is explained and agreed upon in advance before any services are rendered. Annual fees range from 0.25% to 1.50%. Fixed fees range from $500 to $50,000.

Plan advisory services begin with the effective date of the Agreement, which is the date you sign the Investment Advisory Agreement. For that calendar quarter, fees will be adjusted pro rata based upon the number of calendar days in the calendar quarter that the Agreement was effective. Our fee is billed in advance on the last business day of the calendar quarter. Invoices are sent each quarter to either the client or the custodian of the Plan. For Plans where our fee is billed to the custodian, the fee is deducted directly from the participant accounts. A signed authorization permitting us to be paid directly from the custodial account is outlined in the Investment Advisory Agreement. In some circumstances, you can have the fee automatically taken from your bank account or directly charged to a credit card.

Either party may terminate the Agreement at any time upon 90 days written notice. You are responsible for paying for services rendered until the termination of the agreement.

CONSULTING SERVICES / FINANCIAL PLANNING FEES

GK provides planning services for clients who need advice on a limited scope of work. GK will negotiate consulting fees with clients. Fees may vary based on the extent and complexity of the consulting project and may be waived if the client has their assets managed by GK, wherein GK will charge a single fee for services rendered. Fees are negotiated, and clients are billed as services are rendered, in arrears. The hourly fee for these services starts at $200 per hour and will not exceed $300/hour. The flat rate for creating client financial plans is between $500 and $50,000. The final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Either party may terminate the agreement. Upon termination, fees will be prorated to the date of termination and any unearned portion of the fee will not be charged to the client.

The fee is based on an annual flat rate. We will collect this fee on a quarterly basis, in advance. The flat rate will be drafted at the beginning of each quarter, in advance of the quarter and is based on a 12-month rolling period determined by the date you initiate services of GK Wealth Management, LLC.

THIRD PARTY MANAGER FEES

GK also receives compensation from third-party managers (TPAM) approved by GK. These TPAMs compensate GK in the manner described. GK provides investment advice and recommendations on the investment strategies of Third-Party Managers ("Managers" or "TPAM"). Selected Managers are evaluated by GK for client use. Our services include assisting you in identifying your investment objectives and matching personal and financial data with a select list of Managers. This service's intent is to have a selected list of high quality and recognizable third-party investment management firms from which you select one or more Managers to handle daily management of your account(s). Following recommendations from our Investment Adviser Representatives, you will have final authority to select a Manager. The IAR may assist you in completing appropriate documents.

The fee that you pay GK is separate and in addition to the fee that you pay the TPAM. However, GK will often provide clients with the aggregate fee, including the IAR fee and any TPAM fees. The aggregate of these fees will not exceed 3% of assets under management per year. The fees collected for the TPAM's are billed quarterly in advance, collected at the same time any GK advisory fees are collected. The fee is calculated using the value of the assets in the account on the last business day of the prior billing period.

ADDITIONAL FEES AND EXPENSES

Advisory fees payable to us do not include all the fees you will pay when GK purchases or sells securities for your Account(s). The following list of fees or expenses is what you may pay directly to third parties only, whether a security is being purchased, sold or held in your Account(s) under our management.

- Transaction fees;
- SEC fees;
- Custodial Fees;
- Transfer taxes;
- Wire transfer and electronic fund processing fees;
- Account closing fees. Please refer to the "Brokerage Practices" Item 12

PREPAYMENT OF FEES

GK collects fees in advance. Should a refund be necessary, funds will be returned to the client during the next quarterly billing cycle or sooner, via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee by 365.)

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

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

ITEM 6: Performance Based Fees and Side-by-Side Management

GK does not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance-based fees). Our advisory-fee compensation is charged only as disclosed above in Fees and Compensation.

ITEM 7: Account Requirements and Types of Clients

GK provides investment advice to individuals, high-net-worth individuals, families, small businesses, foundations, trusts, and estates. GK also provides investment advice on retirement accounts including IRAs, SEP, Simple, Solo 401(k)s, retirement trusts, defined benefit plans, small business 401(k) plans and corporate 401(k) plans. Our minimum initial account value is $25,000. GK may waive account minimums at our sole discretion.

ITEM 8: Methods of Analysis, Investments Strategies and Risk of Loss

GK seeks to recommend investment strategies that will give a client a diversified portfolio consistent with the client's investment objective. GK does this by analyzing the various securities, investment strategies, and third-party management firms. The goal is to identify a client's risk tolerance and then find a manager with the maximum expected return for that level of risk.

Our investment strategies and advice may vary depending on each client's specific financial situation. GK determines investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

GK determines how to allocate assets among the various asset classes based on the investment strategy chosen, prevailing economic conditions and our determination of where we are in the economic cycle. Potential risks and opportunities are weighed to determine to what degree the portfolio should be invested.

Sometimes, market conditions may cause your account to vary from the established allocation. To remain consistent with the asset allocation guidelines established, your account is monitored on an ongoing basis and rebalanced to the original allocation, or if deemed beneficial, to a new allocation based on the then prevailing economic conditions and within the guidelines of the chosen investment strategy.

In addition to the rebalancing, overall market conditions and microeconomic factors that affect specific holdings in your account may trigger changes in allocation. Your account may also receive informal reviews more frequently.

THIRD PARTY PORTFOLIO MANAGER SELECTION/ EVALUATION

GK seeks to recommend investment strategies that will give a client a diversified portfolio consistent with the client's investment objective. GK does this by analyzing the various securities, investment strategies, and third-party management firms. The goal is to identify a client's risk tolerance and then find a manager with the maximum expected return for that level of risk.

GK examines the experience, expertise, investment philosophies and past performance of independent, third-party managers to determine if that manager has demonstrated an ability to invest over a period and in different economic conditions.
GK monitors the managers' underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our

due-diligence process, GK surveys the managers' compliance and business enterprise risks.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a managers' portfolio, there is also a risk that the manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as GK does not control the managers' daily business and compliance operations, GK may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

INVESTMENT PHILOSOPHY

Prior to making recommendations, GK determines your financial status, needs, time horizon, investment objectives, risk tolerance, and tax status. From this, GK creates an investor profile and general asset allocation target. While GK believes asset allocation is a key factor affecting the long-term rate of return, GK also believes fundamental research and wise securities selection is vital. To that end, GK selects from a narrow, refined list of institutional fund managers known for excellence in their respective disciplines. GK focuses primarily on the people, processes, research, consistency, and culture rather than simply recent "high performance" or "track record."

As much as reasonably possible, GK strives to:

- Diversify strategically with non-correlating assets.
- The balance between growth and value styles.
- Diversify globally.
- Rebalance as markets change.
- Manage tax efficient returns wherever possible.

GK determines how to allocate assets among the various asset classes based on the investment strategy chosen, prevailing economic conditions and our determination of where we are in the economic cycle. Potential risks and opportunities are weighed to determine to what degree the portfolio should be invested.

Sometimes, market conditions may cause your account to vary from the established allocation. To remain consistent with the asset allocation guidelines established, your account is monitored on an ongoing basis and rebalanced to the original allocation, or if deemed beneficial, to a new allocation based on the then prevailing economic conditions and within the guidelines of the chosen investment strategy. In addition to the rebalancing, overall market conditions and microeconomic factors that affect specific holdings in your account may trigger changes in allocation. Our investment strategies may include long-term, and short-term holds as wells as trading (securities sold within 30 days) and the use of options, margin, and short sales. You may place reasonable restrictions on the strategies to be employed in your portfolio and the type of investments to be held in your portfolio.

RISKS OF LOSS

You are advised and are expected to understand that our past performance is not a guarantee of future results, and that certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account. Investing in securities involves risk of loss which you should be prepared to bear.

There are principal and material risks involved which may adversely affect the account value and total return. There are other circumstances (including additional risks that are not described here) which could prevent your portfolio from achieving its investment objective. It is important to read all the disclosure information provided and to understand that you may lose money by investing in any of our strategies.

You should be aware that your account is subject to the following risks:

MARKET RISK — Even a long-term investment approach cannot guarantee a profit. Economic, political and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is a risk that you will lose money, and your investment may be worth more or less upon liquidation.

FOREIGN SECURITIES AND CURRENCY RISK — Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

CAPITALIZATION RISK — Small-cap and mid-cap companies may be hindered because of limited resources or less diverse products or services, and their stocks have historically been more volatile than the stocks of larger, more established companies.

INTEREST RATE RISK — In a rising rate environment, the value of fixed-income securities generally declines, and the value of equity securities may be adversely affected.

CREDIT RISK — Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade of an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and, thus, impact the fund's performance.

SECURITIES LENDING RISK — Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.

DERIVATIVE RISK — Derivatives are securities, such as futures contracts, whose value is derived from that of other securities or indices. Derivatives can be used for hedging (attempting to reduce risk by offsetting one investment position with another) or non-hedging purposes. Hedging with derivatives may increase expenses, and there is no guarantee that a hedging strategy will achieve the desired results.

EXCHANGE-TRADED FUNDS — ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in secondary markets and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."

PERFORMANCE OF UNDERLYING MANAGERS — We select the mutual funds and ETFs in the asset allocation models. However, TCM depends on the manager of such funds to select individual investments in accordance with their stated investment strategy.

OPTIONS RISK — Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.

CASH AND CASH EQUIVALENTS — A portion of your assets may be invested in cash or cash equivalents to achieve your objective, provide going distributions and/or take a defensive position. Cash holdings may result in a loss of market exposure.

FIXED INCOME SECURITIES — The return and principal value of bonds fluctuate with changes in market conditions. Fixed income securities have interest rate risk and credit risk. As interest rates rise, existing bond prices fall and can cause the value of an investment to decline. Changes in interest rates generally have a greater effect on bonds with longer maturities than those with shorter maturities. If bonds are not held to maturity, they can be worth more or less than their original value. Credit risk refers to the possibility that the issuer of a bond will not be able to make principal and/or interest payments. High yield bonds, also known as "junk bonds", carry a higher risk of loss of principal and income than higher rated investment grade bonds.

EQUITY SECURITIES — In general, the prices of equity securities are more volatile than those of fixed income securities. The prices of equity securities will rise and fall in response to a number of different factors, including events that affect particular issuers as well as events that affect entire financial markets or industries. Small and mid-capitalization stocks may have greater price volatility, lower trading volume and less liquidity than large capitalization stocks.

MUTUAL FUNDS — Mutual funds may invest in different types of securities, such as value or growth stocks, real estate investment trusts, corporate bonds or U.S. government bonds. There are risks associated with each asset class.

An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Although money market funds seek to preserve the value of your investment, it is possible to lose money by investing in the fund. Redemption is at the current net asset value, which may be more or less than the original cost. Aggressive growth funds are most suitable for investors willing to accept price per share volatility since many companies that demonstrate high growth potential can also be high risk. Income from tax-free mutual funds may be subject to local, state and/or the alternative minimum tax.

Because each mutual fund owns different types of investments, performance will be affected by a variety of factors. The value of your investment in a mutual fund will vary daily as the values of the underlying investments in a fund vary. Such variations generally reflect changes in interest rates, market conditions and other company and economic news. Their risks may become magnified depending on how much a fund invests or uses certain strategies.

You will find additional information regarding these risks in the prospectus for each individual mutual fund held in your account. You can request a copy of a prospectus from your IAR or by contacting the investment company directly.

ALTERNATIVE INVESTMENTS — Alternative investments are illiquid investments and do not trade on a national securities exchange. Alternative investments typically include investments in direct participation program securities (partnerships, limited liability companies, business development companies or real estate investment trusts), commodity pools, private equity, private debt or hedge funds. Alternative investments are subject to various risks, such as illiquidity and property devaluation based on adverse economic and real estate market conditions.

Alternative investments are not suitable for all investors. Investors considering an investment strategy utilizing alternative investments should under that alternative investments are generally considered speculative in nature and may involve a high degree of risk, particularly if concentrating investments in one or few alternative investments. These risks are potentially greater and substantially different than those associated with traditional equity or fixed income investments.

You will find additional information regarding these risks in the product’s prospectus. You can request a copy of a prospectus from your IAR. You should read the prospectus carefully before investing in an alternative investment.

ITEM 9: Disciplinary Information

A. Criminal or Civil Actions

   There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-Regulatory Organizations (SRO) Proceedings

Specifically, Mr. Kirsch has 2 discharges. On September 6, 2017, Mr. Kirsch was discharged from Triumph Capital Management, a Registered Investment Advisor, for allegations about violation of firm policy regarding social media and private security transactions.

On September 6, 2017, Mr. Kirsch was discharged from Summit Brokerage Services Inc. for allegations about violations of firm policy regarding social media and private securities transactions.

In April 2019, a regulatory action was initiated against Mr. Kirsch by the State of Nevada in connection with allegations related to a social media violation regarding Summit Brokerage Services firm policy. There were also allegations regarding private security transactions, of which FINRA investigated and had no findings.

Additionally, Mr. Kirsch was subject to an order & consent related to the above two items based on the State of Nevada and GK Wealth was required to sign the consent order requiring heightened supervision for a 24 month period from 4/1/2019-4/1/2021.

*****PLEASE NOTE**: The Consent Order has been lifted by the Nevada Secretary of State Securities Division as of May 3rd, 2021. GK is longer on heightened supervision.

Further information can be obtained by reviewing the CRD records of Mr. Kirsch. GK Wealth Management LLC CRD number is: 296847

ITEM 10: Other Financial Industry Activities and Affiliations

GK's investment advisors and management persons are NOT registered nor do any of GK's investment advisors or management persons have applications pending to register as a broker-dealer or registered representative of a broker dealer.

GK's investment advisors and management persons are NOT registered nor do any of GK's investment advisors or management persons have applications pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

INSURANCE

GK's IAR's may act as agents appointed with various life, disability or other insurance companies, receive commissions, trails, or other compensation from the respective product sponsors and/or because of effecting insurance transactions for clients. However, clients should note that they are under no obligation to purchase any insurance products through GK or its IARs.

OUTSIDE BUSINESS ACTIVITIES

IAR's of GK may have Outside Business Activities ("OBA"). The OBAs of your IAR are fully described and disclosed on his/her ADV form 2B. OBAs can present a material conflict of interest because your IAR may have an incentive to spend more time on their outside business activity than focusing on your advisory relationship. GK monitors and approves OBAs to help reduce this conflict of interest.

You can find more information regarding your IAR's outside business activity by visiting FINRA Broker Check:www.finra.org

If you want a copy of your IAR's most recent ADV form 2B, contact our Chief Compliance Officer, Griffin M. Kirsch.

SELECTION OF OTHER ADVISERS OR MANAGERS AND HOW THIS ADVISER IS COMPENSATED FOR THOSE SELECTIONS

GK may direct clients to third-party investment advisers. Clients will pay GK its standard fee in addition to the standard fee for the advisers to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. GK will always act in the best interests of the client, including when determining which third party investment adviser to recommend to clients. GK will ensure that all recommended advisers are exempt, licensed or notice filed in the states in which GK is recommending them to clients.

OTHER POTENTIAL CONFLICTS OF INTEREST

As a fiduciary, the Firm and all Code Persons have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of its clients. With this duty, the Firm and its Code Persons can achieve this obligation by trying to avoid conflicts of interest and by fully disclosing all material facts concerning any conflict that does arise with respect to any client. A "conflict of interest" may occur when a IARs private interests may be inconsistent with the interests of the Firm's clients and/or his/her service to the Firm. Additionally, IARs must try to avoid situations that have even the appearance of conflict or impropriety.

Conflicts of interest may arise where the Firm or its IARs have reason to favor the interests of one client over another client (e.g., larger accounts over smaller accounts, accounts compensated by performance fees over accounts not so compensated, accounts in which employees have made material personal investments, accounts of close friends or relatives of IARs). The Firm prohibits inappropriate favoritism of one client over another client that would constitute a breach of fiduciary duty.

Additionally, from time-to-time GK may refer clients of the Firm to Laura Kirsch LLC, which is a real estate company owned and operated by a family member of Griffin Kirsch, an advisor with GK. This relationship may cause a conflict of interest. To mitigate this potential conflict of interest, clients of GK who are referred to Laura Kirsch LLC are advised that at no time are they obligated to use Laura Kirsch LLC for any real estate transaction and that they may use any realtor/real estate company that they choose.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

ITEM 11: Code of Ethics Participations or Interest in Client Transactions and Personal Trading

GK has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at GK must acknowledge the terms of the Code of Ethics annually, or as amended. GK will provide a copy of our Code of Ethics to any client or prospective client upon request.

GK does not recommend that clients buy or sell any security in which GK or a related person has a material financial interest. GK employees and persons associated with GK are required to follow the GK Code of Ethics.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of GK will not interfere with making decisions in the best interest of advisory clients and implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of GK clients. In addition, the Code requires pre-clearance of many transactions and restricts trading close to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between GK and its clients. Moreover, in the event any officer or employee of GK trades a security at the same time such security is recommended to a client the client will always get the best price. GK's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Griffin Kirsch. Concerning financial planning, recommendations may pose a potential conflict between the interests of GK and the interests of the Client. If a conflict exists between the interests of GK and the interests of the client, the client is under no obligation to act upon the recommendation of GK and the Firm will not obtain discretionary or trading authority to implement the agreements between GK.

ITEM 12: Brokerage Practices

GK does not recommend, request or require that clients direct GK to execute transactions through a specific broker/dealer. GK does not receive research or other products or services in connection with client transactions.

GK does not use "soft dollars" to obtain research or other services as allowed under Section 28(e) of the Securities and Exchange Act of 1934.

GK does not select or recommend custodian/broker based upon receiving client referrals from a custodian/broker or third party. GK does not routinely recommend, request or require that you direct us to execute transactions through a specified custodian/broker. Additionally, GK typically does not permit you to direct brokerage.

In the event you request us to recommend a custodian/broker for execution and/or custodial services, GK generally recommends your account to be maintained at Charles Schwab. GK may recommend that you establish accounts with Charles Schwab to maintain custody of your assets and to effect trades for your accounts. You are under no obligation to act upon any recommendations, and if you elect to act upon any recommendations, you are under no obligation to place the transactions through any broker/dealer GK recommends. Our recommendation is generally based on the broker's cost and fees, skills, reputation, dependability, and compatibility with the client. You may be able to obtain lower commissions and fees from other brokers, and the value of products, research, and services given to us is not a factor in determining the selection of broker/dealer or the reasonableness of their commissions.

Transactions for each client will be affected independently unless GK decides to purchase or sell the same securities for several clients at approximately the same time. GK may aggregate orders to allocate fairly among client accounts.

Aggregate Purchases - Transactions for each client will be affected independently unless GK decides to purchase or sell the same securities for several clients at approximately the same time. Aggregate trading allows GK to execute equity trades in a timely manner at an average share price. Usually, aggregate trades will occur among clients who maintain accounts at a particular broker/dealer. GK may aggregate orders to allocate fairly among client accounts. Fees are determined by the broker/dealer and are the same whether traded as an aggregate order.

CHARLES SCHWAB & CO., INC; PROGRAM

GK participates in the Charles Schwab Services program. Charles Schwab Services is a division of Charles Schwab & Co, Inc, Inc. ("Schwab") member SIPC.

Trade Errors

GK has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in the best interest of our clients. In cases where a client causes a trading error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trading error, the client may not be able to receive any gains generated because of the error correction. In all situations where the client does not cause the trading error, the client will be made whole, and GK will absorb any loss resulting from the trading error if the error was caused by our firm. If the error is caused by the custodian/broker, the custodian/broker will be responsible for covering all trade error costs.

ITEM 13: Review of Account

The underlying securities within the investment supervisory services are regularly monitored. An annual review is usually conducted in person or by telephone. The purpose of all these reviews is to ensure that the investment plan continues to be implemented in a manner which matches your objectives and risk tolerances. More frequent reviews may be triggered by material changes in variables such as your individual circumstances, or the market, political or economic environment. You are urged to notify us of any changes in your personal circumstances.

The supervised person who conducts these reviews is the Investment Advisor Representative tied to each respective client/account.

All accounts opened by the firm GK Wealth Management LLC are reviewed by Chief Compliance Officer, Griffin Kirsch.

STATEMENTS AND REPORTS

You are urged to compare the reports provided by GK against the account statements you receive directly from your account custodian. GK can provide clients with Performance/Position summary reports upon request. Reports may also be provided at every client meeting.

The custodian for the individual client's account will also provide clients with an account statement at least quarterly.

ITEM 14: Client Referrals and Other Compensation

GK does not accept non-client economic benefits such as sales awards. Thus, no such arrangement exists, and no conflict of interests will arise.

GK may, pursuant to SEC Rule 206(4)-3 (a)(2)(iii)(A) pay a cash fee to a promoter if GK enters into a written agreement with the promoter which describes the solicitation activities to be engaged in on behalf of GK, contains an undertaking by the promoter to perform his duties under the agreement in a manner consistent with the instructions of GK and the provisions of the Advisers Act and rules, and requires that the promoter at the time of the solicitation, deliver to the client a current copy of GK's written disclosure statement required by Rule 204-3 and a separate written disclosure document, also known as a solicitor's disclosure document, containing the information required by the Rule.

The Firm does not have any promoter in place now. If the Firm engages a promoter, the necessary fees and other information will be updated.

GK will not directly or indirectly compensate any person for client referrals other than as described herein.

The IARs of GK could be licensed to offer insurance products and will receive customary commissions for the sale of such products should a client decide to make the purchase. When selling these products, a conflict of interest exists. This is due to commission payment or fee structure associated with the insurance business. Your IAR may have an incentive to affect an insurance transaction to generate compensation rather than basing their recommendations solely on your needs. GK mitigates this conflict by monitoring its IARs outside business activities and their overall recommendations to you.

Sometimes, GK may receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as advertising, publishing and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for whom sales have been made or anticipated sales that will be made.

ITEM 15: Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access to or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor can access or control client funds or securities, they have custody and must ensure proper procedures are implemented. GK is deemed to have custody of client funds and securities whenever GK is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody GK will ever maintain. Note that authorization to trade in client accounts is not deemed custody by regulators.

For accounts in which GK is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held by a qualified custodian in a separate account for each client under that client’s name. Clients or an independent representative of the client will direct the establishment of all accounts and therefore are aware of the qualified custodian’s name, address and the way the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client’s independent representative, at least quarterly. You should carefully review those statements and are urged to compare the statements against reports received from GK. When you have questions about your account statements, you should contact GK or the qualified custodian preparing the statement.

ADVISORY FEES

When advisory fees are deducted from an account, GK is responsible for calculating the fee and delivering instructions to the custodian. At the same time, GK instructs the custodian to deduct fees from the client’s account.

GK has custody of the funds and securities solely because of its authority to withdraw from client accounts to pay the advisory fee. GK will always have written authorization from the client to deduct advisory fees from the account held with the qualified custodian. Each time a fee is directly deducted from a client account, GK will concurrently:

1. Send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
2. Send the client an invoice or statement itemizing the fee. Itemization includes a formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time covered by the fee.

THIRD PARTY MONEY MOVEMENT

The SEC issued a no-action letter ("Letter") about Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule and clarified that an adviser who can disburse client funds to a third party under a standing letter of authorization ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodians:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.

- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.

- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.

- The client can terminate or change the instruction to their qualified custodian.

- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.

- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.

- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.;

ITEM 16: Investment Discretion

GK provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, GK generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, GK's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to GK.

Where GK does not have discretionary authority to place trade orders, GK will secure client permission prior to effecting securities transactions for the client's account.

ITEM 17: Voting Proxies and Client Securities

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

ITEM 18: Financial Information

GK is required to provide certain financial information or disclosures about its financial condition.

GK does not require or solicit prepayment of more than $1200 in fees per client, six months or more in advance.

GK has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.