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BROCHURE SUPPLEMENT

Shawn K. Jones, CFP

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Purpose of This Brochure Supplement:

This Brochure Supplement provides information about Shawn Jones, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Shawn Jones is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 4242304.

Shawn K. Jones, CFP  
2730 S Val Vista Dr  
Suite #133  
Gilbert, AZ 85295  
(480) 788-0071

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

## Item 2 – Educational Background and Business Experience

Shawn K. Jones - born 1972

### Formal Education after High School

Executive Certificate Financial Planning, Xavier University

Bachelor of Science in Business Management, Cincinnati State

Securities Licenses: Series 65

Insurance Licenses: Arizona Life, Health, and Variable Products

### Business Background

Financial Advisor, Gallacher Capital Management, LLC  
(June 2014 – Present)

Registered Representative, LPL Financial LLC  
(June 2014 – July 2016)

Account Executive, Fidelity Investments  
(January 2004 – June 2014)

Trading, Investments Representative, Fidelity Investments  
(May 2000 – January 2004)

### Professional Designations

Designation: Certified Financial Planner (“CFP”) January 2004

Issuing Organization: Certified Financial Planner Board of Standards, Inc (“CFPBS”)

Prerequisites/Experience Required: Must have a bachelor’s degree (or higher) from an accredited college or university, and three years of full-time personal financial planning experience.

Educational Requirements: Must complete a CFP-board registered program or hold another designation authorized by the CFPBS.

Continuing Education: 30 hours every two years.

### Item 3 – Disciplinary Information

None

### Item 4 – Other Business Activities

Shawn Jones is involved in the following investment-related activities:

- Licensed Insurance agent. In such capacity, Shawn K. Jones may offer fixed and variable life insurance products, disability income coverage, long-term care insurance, and health insurance. Normal and customary commissions are received from any purchases made by clients. The client is under no obligation to purchase these products through Shawn Jones. In addition, he may receive trailing compensation from fixed or variable life policies. The potential for receipt of commissions and other compensation gives Shawn Jones an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this conflict, disclosure is made to the client at the time purchases are made, identifying the nature of the transaction or relationship, the role to be played by Shawn Jones, and any compensation (e.g., commissions, trails) to be paid by the client and/or received by the insurance agent.

### Item 5- Additional Compensation

The following forms of additional compensation may be received from providing advisory services to clients:

- Shawn Jones may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

### Item 6 - Supervision

Shawn Jones' advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Shawn Jones are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

Kevin E. Gallacher

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about Kevin Gallacher, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Kevin Gallacher is available on the Securities and Exchange Commission (“SEC”) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 1970458.

Kevin E. Gallacher  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124  
(303) 708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Item 2 – Educational Background and Business Experience

Kevin Gallacher - born 1961

Formal Education after High School

Bachelor of Business Administration in Finance, University of Texas-El Paso

Business Background

Founding Principal, Gallacher Capital Management, LLC (July 1992 – Present)

Investment Advisory Representative, Gallacher Capital Management, LLC. (July 1992 – Present)

Registered Representative, LPL Financial, LLC (September 2009 – June 2016)

Registered Representative, Mutual Service Corporation (February 1994 – September 2009)

Professional Designations

None

Item 3 – Disciplinary Information

None

Item 4 – Other Business Activities

In addition, Mr. Gallacher is involved in the following non-investment related outside business activities:

- Kevin Gallacher and his spouse own Gallacher, LLC. Gallacher, LLC holds a 90% ownership interest in Gallacher Capital Management LLC, an SEC registered investment advisory firm.
- Gallacher, LLC owns interests in the following: a 50% ownership interest in Gallacher Development, LLC, a separate entity in the business of self-storage real estate.
- Kevin Gallacher and his spouse own KSJ Realty, LLC, an investment real estate holding company which owns a business condo located in Colorado where GCM maintains offices.

Item 5 - Additional Compensation

None

Item 6 - Supervision

Kevin Gallacher's advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Kevin Gallacher are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

Jordan K. Gallacher

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about Jordan Gallacher, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Jordan Gallacher is available on the Securities and Exchange Commission (“SEC”) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 6205745.

Jordan K. Gallacher  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124  
(303) 708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

## Item 2 – Educational Background and Business Experience

Jordan K. Gallacher - born 1987

### Formal Education after High School

Bachelor of Business Administration in Finance, University of Texas-El Paso

Master of Science in Applied Quantitative Science, University of Denver, Daniels College of Business

Securities Licenses: Series 66

### Business Background

Principal, Gallacher Capital Management, LLC  
(January 2017 – Present)

Investment Advisory Representative, Gallacher Capital Management, LLC.  
(January 2014 - Present)

Registered Representative, LPL Financial, LLC  
(January 2014 – January 2016)

### Professional Designations

None

## Item 3 – Disciplinary Information

None

## Item 4 – Other Business Activities

Jordan K. Gallacher is involved in the following non-investment related outside business activities:

- Mr. Gallacher and his spouse own Krona, LLC. Krona LLC holds a 5% ownership interest in Gallacher Capital Management, LLC, an SEC registered investment advisory firm.

## Item 5 – Additional Compensation

The following forms of additional compensation may be received from providing advisory services to clients:

- Jordan K. Gallacher may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

#### Item 6 - Supervision

Jordan Gallacher's advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Jordan Gallacher are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

John C. Gillespie

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about John Gillespie, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about John Gillespie is available on the Securities and Exchange Commission (“SEC”) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 4208141.

John C Gillespie  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Item 2 – Educational Background and Business Experience

John C Gillespie - born 1975

Formal Education after High School

Master of Business Administration (“MBA”), W.P. Carey School of Business, Arizona State University

Bachelor of Arts in Economics, Brigham Young University

Insurance Licenses: Life, Health & Accident

Securities Licenses: FINRA Series 66

Business Background

Principal, Gallacher Capital Management, LLC  
(April 2013 – Present)

Investment Advisory Representative, Gallacher Capital Management, LLC  
(September 2007 – Present)

Registered Representative, LPL Financial, LLC  
(September 2009 – January 2016)

Registered Representative, Mutual Service Corporation  
(September 2007 – September 2009)

Investment Consultant, Charles Schwab & Co  
(August 2000 – September 2007)

Professional Designations

None

Item 3 – Disciplinary Information

None

#### Item 4 – Other Business Activities

Mr. Gillespie is involved in the following non-investment-related activities:

- Mr. Gillespie and his spouse own Gillespie Holdings, LLC. Gillespie Holdings, LLC holds a 5% ownership interest in Gallacher Capital Management, LLC, an SEC registered investment advisory firm.

Mr. Gillespie is involved in the following investment-related activities:

- Licensed Insurance agent. In such capacity, Mr. Gillespie may offer fixed and variable life insurance products, disability income coverage, long-term care insurance and health insurance. Normal and customary commissions are received as a result of any purchases made by clients. The client is under no obligation to purchase these products through John Gillespie. In addition, he may receive trailing compensation from fixed or variable life policies. The potential for receipt of commissions and other compensation gives John Gillespie an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this conflict, disclosure is made to the client at the time purchases are made, identifying the nature of the transaction or relationship, the role to be played by Mr. Gillespie, and any compensation (e.g., commissions, trails) to be paid by the client and/or received by the insurance agent.

#### Item 5- Additional Compensation

The following forms of additional compensation may be received as a result of providing advisory services to clients:

- John Gillespie may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

#### Item 6 - Supervision

John Gillespie's advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by John Gillespie are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

Jeffrey Wray

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about Jeffrey Wray, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Jeffrey Wray is available on the Securities and Exchange Commission (“SEC”) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 6645528.

Jeffrey Wray  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

## Item 2 – Educational Background and Business Experience

Jeffrey Wray – born 1993

### Formal Education after High School

Bachelor of Science – Finance, Brigham Young University

### Business Background

Investment Advisory Representative, Gallacher Capital Management, LLC.  
(August 2021 – Present)

Analyst, Gallacher Capital Management, LLC.  
(May 2018 – July 2021)

### Professional Designations

*Designation:* CFA Charterholder

*Issuing Organization:* CFA Institute

*Prerequisites/Experience Required:* The Chartered Financial Analyst (CFA) designation is an international professional designation offered by CFA Institute (to financial analysts who complete a series of three examinations. To become a CFA Charterholder, candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 36 months of qualified, professional work experience. CFA Charterholders are also obligated to adhere to a strict code of ethics and standards governing their professional conduct. The curriculum for the CFA program is based on a Candidate Body of Knowledge established by CFA Institute. The curriculum comprises the topic areas listed here: Ethics, Quantitative Methods, Economics, Corporate Finance, Financial Reporting and Analysis, Security Analysis and Portfolio Management.

## Item 3 – Disciplinary Information

None

## Item 4 – Other Business Activities

None

### Item 5 - Additional Compensation

The following forms of additional compensation may be received as a result of providing advisory services to clients:

- Jeffrey Wray may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

### Item 6 - Supervision

Jeffrey Wray's advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Jeffrey Wray are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

Boman Stacey

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about Boman Stacey, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Boman Stacey is available on the Securities and Exchange Commission (“SEC”) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 7434268.

Boman Stacey  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
303-708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

## Item 2 – Educational Background and Business Experience

Boman Stacey – born 1989

### Formal Education after High School

Master of Business Administration (“MBA”), Haslam College of Business, University of Tennessee

Bachelor of Science in Exercise Science & Business Management, Brigham Young University

Insurance Licenses: Life, Health & Accident

Securities Licenses: Series 65

### Business Background

Investment Advisory Representative, Gallacher Capital Management, LLC.  
(October 2021 – Present)

Consultant, Gallacher Capital Management, LLC.  
(February 2021 – October 2021)

Territory Business Manager, Abbott  
(July 2016 – August 2021)

Global Account Manager, KLAS Research  
(January 2015 – July 2016)

### Professional Designations

*Designation:* Chartered Retirement Planning Counselor (“CRPC”)

*Issuing Organization:* The College for Financial Planning

*Prerequisites/Experience Required:* The CRPC is awarded to students who successfully complete the program; pass the final examination; and comply with the Code of Ethics. Students must renew their CRPC designation every two years by completing 16 hours of continuing education; reaffirming their agreement with the Code of Ethics; and a fee.

### Item 3 - Disciplinary Information

None

### Item 4 – Other Business Activities

Mr. Stacey is involved in the following investment-related activities:

- Licensed Insurance agent. In such capacity, Mr. Stacey may offer fixed life insurance products, disability income coverage, long-term care insurance and health insurance. Normal and customary commissions are received as a result of any purchases made by clients. The client is under no obligation to purchase these products through Boman Stacey. In addition, he may receive trailing compensation from fixed life policies. The potential for receipt of commissions and other compensation gives Boman Stacey an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this conflict, disclosure is made to the client at the time purchases are made, identifying the nature of the transaction or relationship, the role to be played by Boman Stacey, and any compensation (e.g., commissions, trails) to be paid by the client and/or received by the insurance agent.

### Item 5 – Additional Compensation

The following forms of additional compensation may be received from providing advisory services to clients:

- Boman Stacey may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

### Item 6 - Supervision

Boman Stacey's advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Boman Stacey are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

Quentin Stoker

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about Quentin Stoker, an Investment Advisory Representative of Gallacher Capital Management, LLC ("GCM"). Each client should receive a copy of GCM's ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM's Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Quentin Stoker is available on the Securities and Exchange Commission ("SEC") website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 7174966.

Quentin G. Stoker  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

## Item 2 – Educational Background and Business Experience

Quentin G. Stoker - born 1985

### Formal Education after High School

Quentin Stoker attended Brigham Young University where he received a graduate degree in the Master of Accountancy program and a Bachelor of Science in Accounting. Quentin Stoker is a member of American Institute of Certified Public Accountants

Securities Licenses: Series 65

### Business Background

Investment Advisory Representative, Gallacher Capital Management, LLC  
(January 2024 – Present)

Owner, Stoker Advisory, Tax, & Accounting, PC  
(May 2022 – Present)

Senior Accounting Manager, Figure Financial, Inc.  
(May 2022 – January 2024)

Investment Advisory Representative & Senior Tax Manager, Thomas Doll  
(July 2019 – June 2022)

Senior Manager, Deloitte & Touche LLP  
(August 2011 – July 2019)

### Professional Designations

Designation: Certified Public Accountant ("CPA")

Issuing Organization: American Institute of Certified Public Accountants ("AICPA")

Prerequisites/Experience Required: In order to qualify for the CPA designation, most states require a minimum of a bachelor's degree to become a CPA, as well as two years of accounting experience to qualify. Once you are eligible, you are required to take the CPA Examination, which consists of four tests. In order to maintain the CPA designation, 80 hours of CPE each renewal period, of which, 4 hours must be ethics; 16 hours of live/interactive webinars; and minimum of 40 hours related to accounting, auditing, business law, or consulting services.

Item 3 – Disciplinary Information

None

Item 4 – Other Business Activities

Mr. Stoker is involved in the following non-investment related outside business activities that may provide a substantial amount of income and/or require a substantial amount of time during various parts of the year:

- Mr. Stoker is the founder and owner of Stoker Advisory, Tax, & Accounting, PC. The firm provides tax preparation, tax planning, and bookkeeping services for individuals and small businesses.

Item 5 – Additional Compensation

The following forms of additional compensation may be received from providing advisory services to clients:

- Quentin Stoker may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

Item 6 - Supervision

Quentin Stoker's advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Quentin Stoker are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.

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BROCHURE SUPPLEMENT

Austin Chambers

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Purpose of This Brochure Supplement

This Brochure Supplement provides information about Austin Chambers, an Investment Advisory Representative of Gallacher Capital Management, LLC (“GCM”). Each client should receive a copy of GCM’s ADV Part 2A (Firm Brochure) in accompaniment with this document. A copy of GCM’s Firm Brochure may also be obtained by contacting the Compliance Department at the GCM address below. Additional information about Austin Chambers is available on the Securities and Exchange Commission (“SEC”) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and searching CRD#: 7855346.

Austin Chambers  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Gallacher Capital Management  
10465 Park Meadows Drive  
Suite #107  
Lone Tree, CO 80124-5320  
(303) 708-1640

Item 2 – Educational Background and Business Experience

Austin Chambers - born 1995

Formal Education after High School

Master of Business Administration (“MBA”), Maine Business School, University of Maine

Bachelor of Arts in History, Brigham Young University

Securities Licenses: Series 65

Business Background

Investment Advisory Representative, Gallacher Capital Management, LLC  
(February 2024 – Present)

Client Relationship Manager, Gallacher Capital Management, LLC  
(May 2022 – January 2024)

Operator, Maine Distributors (June 2021 – May 2022)

Professional Designations

Designation: Chartered Retirement Planning Counselor (“CRPC”)

Issuing Organization: The College for Financial Planning

Prerequisites/Experience Required: The CRPC is awarded to students who successfully complete the program; pass the final examination; and comply with the Code of Ethics. Students must renew their CRPC designation every two years by completing 16 hours of continuing education; reaffirming their agreement with the Code of Ethics; and a fee.

Item 3 – Disciplinary Information

None

Item 4 – Other Business Activities

None

### Item 5- Additional Compensation

The following forms of additional compensation may be received as a result of providing advisory services to clients:

- Austin Chambers may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, marketing or advertising initiatives. Advisory product sponsors may also pay for education or training events that s/he may attend. These benefits may represent a conflict of interest.

### Item 6 - Supervision

Austin Chambers' advisory activities are supervised by the Compliance Department at GCM. The Compliance Department is responsible for review of transactions, account suitability, review of email, among other activities. In addition, all accounts that are managed by Austin Chambers are subjected to supervision which includes: monitoring account activity, potential concentration levels of holdings, and performance of the account versus defined benchmarks. The Compliance Department can be reached at (303) 708-1640.