

# Wrap Fee Brochure

(Appendix 1 to Part 2A of Form ADV)

## GA Repple Optimized Investment Platform (Portfolio Management Services)



### G.A. Repple & Company

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This wrap fee brochure provides information about the qualifications and business practices of G.A. Repple & Company. If you have any questions about the contents of this brochure, please contact us at: (407) 339-9090, or Toll Free at (866) 373-7753. You may also contact us by e-mail @ [compliance@garepple.com](mailto:compliance@garepple.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. Although we are registered with the SEC, that alone is not meant to imply that we hold a specific level of skill or training.

Additional information about G.A. Repple & Company is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Revision: March 31, 2022**

## **Item 2: Material Changes**

### **Material Changes**

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#### **Annual Update**

The Material Changes section of this wrap fee brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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#### **Material Changes since the Last Update**

Revised General Fee Information section

Disciplinary History has been updated

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#### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (407) 339-9090, or Toll Free at (866) 373- 7753. You may also contact us by e-mail @ [compliance@garepple.com](mailto:compliance@garepple.com).

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#### **Item 4: Services, Fees and Compensation**

- A. Description of Program Services: The GA Repple Optimized Investment Platform wrap fee program offers two strategies. The first is the Exchanged-Traded Fund (ETF) strategy. The second is the Biblically-Responsible Investing (BRI) strategy. A series of portfolio models positioned at various points along the risk/return spectrum are available within each strategy. Portfolio models within the BRI strategy only select Equities (Stocks) and ETF's from a pool that have successfully passed screening used by BRI-oriented third-party fund managers selected by G.A. Repple & Company.

Once a client's assets are invested, G.A. Repple & Company may add, remove, or replace securities in these model portfolios at its discretion. Clients that participate in the program are required to grant full discretionary investment authority to G.A. Repple & Company, the Advisor and Portfolio Manager, and Gravity Investments LLC, the Model Manager, to invest, reinvest, sell, exchange, and otherwise deal with program assets in its discretion. The Model Manager takes input from G.A. Repple & Company regarding which securities may be added to portfolio models, and the Model Manager then builds the portfolio model, trades the accounts, and periodically optimizes and rebalances the accounts.

Program Fees: A wrap fee is charged for the program. This means that a participating client will pay a single, all-inclusive fee, which may vary according to the platform chosen by the client. For clients who choose to use the program's BRI strategy with portfolio models that may include both Exchange-Traded Funds (ETFs) and Stocks, the minimum total account fee is .25% and the maximum total account fee is 2.00%. Alternatively, for clients who choose to use the program's ETF strategy with portfolio models that are limited only to ETFs, the fee varies according to the following schedule.

##### **ETF strategy Fee Schedule**

<b>Min. Total Account Fee</b>	<b>Max. Total Account Fee</b>
0.25%	2.00%

Fees are calculated at the end of each month and billed in advance in accordance with the client's signed agreement. The previous month's portfolio value is used for the basis. That basis is then multiplied by the annual rate, then divided by 365 or 366 (depending

on the days in the calendar year) and multiplied by the number of days in that billing period.

Fees are due and payable in advance and are based upon the market value of the client's account assets as determined by the Custodian as of the close of business on the last day of the previous calendar month. Fees for the initial period will be adjusted pro-rata based upon the number of calendar days in the calendar period that the adviser agreement goes into effect.

The advisory relationship may be terminated by the client or by third parties to the contract in accordance with the provisions of the advisory agreement. The client will typically receive a pro rata refund of any prepaid advisory fees. Any unpaid fees become immediately due and payable. Additionally, a client may terminate an advisory agreement without being assessed any fees or expenses within (5) business days of its signing.

Clients will receive an account statement from their Custodian ("NFS") at least quarterly. The statement includes the amount of any fees paid directly to the Advisor. Fees are automatically debited from client accounts pursuant to written authorization.

Fees are negotiable at the sole discretion of the Advisor. G.A. Repple & Company, as the program's portfolio manager, is paid between 0.250% and 0.625% of the total fee paid by a client.

- B. This program may cost the client more or less than purchasing such services separately. The cost of the program includes all administrative and clearing costs.
- C. Additional Fees: The wrap fee does not include certain fees that may be charged by a broker or Custodian providing services to the client or the account. Such fees would be separately billed to the account by the clearing broker/dealer, National Financial Services, LLC. Such other fees could include but are not limited to: annual IRA maintenance fee, wire fees, insufficient funds or returned check fees, overnight mail charges, and/or charges to issue securities certificates.
- D. Your IAR will receive compensation as a result of your participation in this program.

#### **Item 5: Account Requirements and Types of Clients**

Account Requirements: There are minimum account size requirements applicable to this wrap fee program, according to the platform utilized by a client. The minimum account size to open or maintain an account on the ETF Platform is \$25,000. The minimum account size to open or maintain an account

on the BRI Platform is \$100,000. G.A. Repple & Company has the ability to decide with whom it will conduct business, and it can impose restrictions on the opening of new accounts at any time.

Types of Clients: G.A. Repple & Company generally provides investment advice to individuals, banks or thrifts, institutions, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations or business entities, and other pooled investment vehicles. Client relationships vary in scope and length of service.

#### **Item 6: Portfolio Manager Selection and Evaluation**

- A. G.A. Repple & Company is the only portfolio manager available under the wrap fee program described in this brochure. G.A. Repple & Company cannot be replaced as portfolio manager for the program or any particular client.

Returns are calculated by Gravity Investments LLC. Returns are calculated using a method preferred by the Global Investment Performance Standards (GIPS). This method calculates returns by the retroactive application of a systematic process which creates optimized portfolios and then evaluates the performance of those in a subsequent period. The actual performance investors experience may be different for a variety of reasons, for instance the timing of when the investment was made.

Neither G.A. Repple & Company nor any third-party reviews performance information.

- B. No related person of G.A. Repple & Company acts as a portfolio manager for this wrap fee program described in this brochure.
- C. Types of Advisory Services Offered by G.A. Repple & Company: direct asset management services, on both a discretionary and non-discretionary basis and a wrap or non-wrap basis; recommendation of third-party asset managers; financial planning; consulting; and portfolio management. Also, on more than an occasional basis, G.A. Repple & Company furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

Tailored Advisory Services: Advisory services are tailored to the individual needs of clients based on the information provided by clients to the Advisor and/or its IARs, such as their individual investment objectives, financial condition, risk tolerance, time horizon, life goals, and religious and/or social convictions. Clients may impose restrictions on investing in certain securities or types of securities, however, such restrictions may prevent a client from participating in any or all available programs. For example, if a client wishes to exclude BRI-screened stocks, he or she would be precluded from participating BRI strategy under the GA Repple Optimized Investment Platform Wrap Fee Program.

**Performance-Based Fees:** Sharing of Capital Gains - G.A. Repple does not use a performance-based fee structure because of the potential conflict of interest. The firm believes that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

### **Methods of Analysis, Investment Strategies and Risk of Loss**

**Methods of Analysis:** Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

**Investment Strategies:** The investment strategy for a specific client is based upon the objectives stated by the client during consultations. Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

**Risk of Loss:** All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

**Voting Client Securities:** Proxy Votes - G.A. Repple does not take any action or render any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which client assets may be invested. In addition, Advisor will not take any action or render any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. NFS (or the appropriate custodian) will, however, forward to clients any information received by the custodian regarding proxies or class action legal matters involving any security held in client accounts.

### **Item 7: Client Information Provided to Portfolio Manager**

Account information and access is provided to Gravity Investments LLC for the express purpose of managing the selected model in each client's account. A non-disclosure and confidentiality agreement exists between GA Repple & Company and Gravity Investments LLC.

### **Item 8: Client Contact with Portfolio Manager**

For clients who have an assigned IAR, the primary relationship is between the IAR and the client. Should a client have a question or concern not addressed by the IAR, reasonable efforts would be made by the Portfolio Manager to address such concerns.



## **Item 9: Additional Information**

### **Disciplinary Information:**

Because of the Firms dual registration, its full profile information can be found at FINRA's BrokerCheck®: [www.finra.org/brokercheck](http://www.finra.org/brokercheck). For licensing, qualification and disciplinary information related to any of the Firms IARs, please see the IAR's Bio Brochure.

In July of 2018 G.A. Repple was named in an administrative proceeding by the Massachusetts Securities Division (Docket Number E-2018-003) that alleged violations of Mass. Gen. Laws ch.110A (the "Act") and of 950 Mass. Code Regs. Section 12.204. From December 2011 through April 2018 a G.A. Repple IAR failed to keep current a website that the IAR had purchased/created through a third-party marketing firm. Certain information became inaccurate due to subsequent complaints received and disclosures posted to FINRA's Central Registration Depository and BrokerCheck, after the website's creation. Due to G.A. Repple's lack of supervision pertaining to this matter, inaccurate information posted by the IAR to the IAR's website became accessible to investors in the Commonwealth of Massachusetts.

In September of 2018 G.A. Repple entered into a Consent Order (the "Order") with the Massachusetts Securities Division, and signed an Offer of Settlement. As part of the Order G.A. Repple agreed to pay an administrative fine of \$25,000 to the Commonwealth of Massachusetts, and to retain the services of an Independent Compliance Consultant to conduct a comprehensive review of G.A. Repple's policies, procedures, training, and/or processes in connection with the allegations contained in the complaint. Additional information can be found by visiting the SEC's Investment Advisor Public Disclosure site found here: <https://adviserinfo.sec.gov/IAPD/default.aspx>

**Other Financial Industry Activities and Affiliations:** Advisor is a privately held corporation that is dually registered with the Financial Industry Regulatory Authority("FINRA") as a fully-disclosed Broker/Dealer, and is also a Securities & Exchange Commission ("SEC") Registered Investment Advisor. Due to its dual registration status, the Advisor discloses the following arrangements material to its investment advisory business in other financially-related activities.

Broker/Dealer: G.A. Repple & Company is also a FINRA registered Broker/Dealer

Financial Planning Firm: G.A. Repple & Company is also a financial planning firm.

Insurance Company or Agency: G.A. Repple & Company is also an Insurance Agency, most of whose associated persons are licensed to sell life and annuity products, fixed annuities, life insurance, health insurance and disability insurance products. Many of our associates also independently represent other insurance agencies and other lines of insurance through their own individual contracts.