

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**



**G4 Financial Planning, LLC**

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June 26, 2023

This brochure provides information about the qualifications and business practices of G4Financial Planning, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 484-326-4107. 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.

**ADDITIONAL INFORMATION ABOUT G4FINANCIAL PLANNING, LLC (CRD #327290) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this 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**

Initial Filing.

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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## Item 4: Advisory Business

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### Firm Description

G4 Financial Planning, LLC ("G4") was founded in 2023. Henry Gibson-Garcia is 100% owner.

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### Types of Advisory Services

#### FINANCIAL PLANNING AND CONSULTING

Financial planning services include a comprehensive evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. G4 will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

#### *Consultation Services*

This service is appropriate for clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a complete financial plan. Client may select individual topics above, or other topics as may be deemed appropriate.

The individual topics that will be included in this service will be outlined and agreed upon on the financial planning and consulting agreement.

If a conflict of interest exists between the interests of G4 and the interests of the Client, the Client is under no obligation to act upon G4's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through G4. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

#### ONGOING FINANCIAL PLANNING

G4 offers Ongoing Financial Planning on a monthly or quarterly basis. Ongoing Financial Planning includes the creation of a Comprehensive Financial Plan delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Clients can expect a monthly or quarterly meeting and topics and deliverables like the following to be covered:

- Comprehensive Financial Plan meeting - The following handouts: Functional Asset Allocation Analysis (Wealth Pyramid); Balance Sheet; Cash Flow Statement; Three Recommendations with anticipated answers to Why, How, What questions.
- Cash Flow Management - Conscious Spending Spreadsheet (comparing money spent vs importance of the purchase); Cash Flow Educational sheet (importance of cash flow, importance of saving before spending, tricks to hack our minds into saving more than we think possible like automatic savings).
- Financial Goal Setting - Educational Handout on Goal Setting (importance of mindset, how to set SMART goals, adjusting goals, and an visualization exercise); if needed, 30 goals worksheet to identify values and goals.
- Investment Planning - Functional Asset Allocations (Wealth Pyramid) which includes an analysis of current asset allocation; Investing 101 handout (explaining common definitions); if needed, a handout with details on changes/rebalance to make in financial portfolios.
- Risk Management - Educational Handout on Role of Insurance and Insurance Buying Tips.
- Real Estate - Homebuying Basics Handout; Mortgage Organizer spreadsheet to organize mortgage/refi quotes.
- Year End Tax Planning - Tax Calculation Process Handout, Tax Basics handout with definitions and common tactics to reduce taxable income.
- Retirement Income Planning - Projected retirement income using Dimensional Fund Advisor's Retirement Income Calculator; Handout on Retirement Income Planning covering typical spending habits in retirement, how to transition into retirement, and common accounts and products used to generate retirement income.
- Estate Planning - Estate Planning handout covering Wills, Will Substitutes, Trusts, and the Probate Process.
- Retirement Accounts - Ode to 401ks handout (common features of 401ks).

#### EDUCATIONAL WORKSHOPS

G4 holds seminars and workshops to educate the public on financial foundations and investment basics. The seminars are educational in nature and no specific investment or tax advice is given.

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## **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

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## **Wrap Fee Programs**

G4 does not sponsor any wrap fee programs.

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## **Client Assets under Management**

G4 does not manage Client assets.

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## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

#### FINANCIAL PLANNING AND CONSULTING

G4 charges fixed fees based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to G4.

G4 Charges a \$250 onboarding fee for any of the financial planning services indicated below that is non-refundable.

#### FIXED FEES

Comprehensive Financial Plans are offered based on a flat fee of \$1,000. After an initial Comprehensive Financial Plan is completed those clients may request additional Consultation services which are offered based on a flat fee of \$500-\$1,000 based on complexity of client needs.

Fees for financial plans are due upon commencement of the Advisory Agreement.

#### ONGOING FINANCIAL PLANNING

Ongoing Financial Planning services include the completion of a comprehensive financial plan. Ongoing Financial Planning services are charged in advance and are \$500 per month or quarter. If a client selects monthly Ongoing Financial Planning services, they will pay \$6,000 annually. If a client selects quarterly Ongoing Financial Planning services, they will pay \$2,000 annually.

#### EDUCATIONAL WORKSHOPS

G4 holds seminars and workshops to educate the public on financial foundations and investment basics. The seminars are educational in nature and no specific investment or tax advice is given. G4 charges the following fees for attendance to these workshops:

- Financial Foundations workshop - \$299 for 7-week course
- Investment Basics workshop - \$499 for 7-week course

Fees for educational workshops are due upon commencement of the agreement.



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**Client Payment of Fees**

Fees for financial planning services and educational workshops will be billed to the Client and paid directly to G4 via QuickBooks ACH.

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**Additional Client Fees Charged**

There are no additional charges to disclose.

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**Prepayment of Client Fees**

G4 does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans and educational workshops are due, in full, at the commencement of the contract.

Fees for Ongoing Financial Planning are due monthly/quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to G4.

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**External Compensation for the Sale of Securities to Clients**

G4 does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of G4.

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**Item 6: Performance-Based Fees and Side-by-Side Management**

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**Sharing of Capital Gains**

This item is not applicable since G4 only provides financial planning and consulting services.

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**Item 7: Types of Clients**

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**Description**

G4 generally provides investment advice to individuals.

Client relationships vary in scope and length of service.

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**Account Minimums**

G4 does not require a minimum to open an account.

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**Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

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**Methods of Analysis**

In developing a financial plan for a Client, G4's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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**Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client

executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind.

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## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

G4 and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

G4 and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

G4 and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of G4 or the integrity of its management.

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## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

No affiliated representatives of G4 are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither G4 nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Henry Gibson-Garcia is also a Standardized Patient Educator with UCF College of Medicine. Approximately 80% of his time is spent on this activity. He will receive separate yet typical compensation for this role. This activity does not represent a conflict of interest

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

G4 does not select or recommend other investment advisors.

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## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **Code of Ethics Description**

The affiliated persons (affiliated persons include affiliated persons and/or independent contractors) of G4 have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of G4 affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of G4. The Code reflects G4 and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

G4's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of G4 may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

G4's Code is based on the guiding principle that the interests of the Client are our top priority. G4's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

G4 will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

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### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

G4 and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

G4 does not manage Clients' assets, does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

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### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

G4 does not manage Clients' assets, does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

G4 does not manage money, therefore G4 does not recommend the use of a particular broker-dealer.

- *Directed Brokerage*

G4 does not recommend broker-dealers.

- *Best Execution*  
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. G4 does not manage or supervise Client accounts.
- *Soft Dollar Arrangements*  
G4 does not maintain any soft dollar arrangements.

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**Aggregating Securities Transactions for Client Accounts**

G4 is not authorized to aggregate purchases and sales and other transactions.

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**Item 13: Review of Accounts**

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**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, G4 suggests updating at least annually.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' financial plan are changes in the tax laws, new investment information, and changes in a Client's personal situation (e.g. employment, marital status, inheritance, birth of a new child, etc.)

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**Content of Client Provided Reports and Frequency**

Clients will receive written reports and written or verbal communications with recommendations or strategies for moving forward.

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**Item 14: Client Referrals and Other Compensation**

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**Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

G4 does not receive any economic benefits from external sources.

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**Advisory Firm Payments for Client Referrals**

G4 does not compensate for Client referrals.

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**Item 15: Custody**

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**Account Statements**

G4 does not have any accounts under their supervision or management.

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**Item 16: Investment Discretion**

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**Discretionary Authority for Trading**

G4 does not manage securities accounts on behalf of Clients.

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**Item 17: Voting Client Securities**

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**Proxy Votes**

G4 does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

G4 does not render advice to clients with respect to voting. Clients should direct all proxy questions to the issuer of the security.

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## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided to Clients because G4 does not serve as a custodian for Client funds or securities and G4 does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

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### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

G4 has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

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### **Bankruptcy Petitions during the Past Ten Years**

G4 has not had any bankruptcy petitions in the last ten years.

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## **Item 19: Requirements for State Registered Advisors**

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### **Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

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### **Outside Business Activities**

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

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### **Performance Based Fee Description**

Neither G4 nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

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### **Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

1. Neither G4 nor its management have been involved in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.
  
2. Neither G4 nor its management have been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.

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**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Henry D. Gibson-Garcia



**G4 Financial Planning, LLC**

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**Website:** [www.g4financialplanning.com](http://www.g4financialplanning.com)

June 26, 2023

This brochure supplement provides information about Henry Gibson-Garcia and supplements the G4Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Henry Gibson-Garcia if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT HENRY GIBSON-GARCIA (CRD #7304852) IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV).**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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#### Principal Executive Officer – Henry D. Gibson-Garcia

- Year of birth: 1990
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#### Item 2 - Educational Background and Business Experience

##### Educational Background:

- Desales University; Bachelor of Arts in Theater; 2012

##### Professional Certifications

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Henry Gibson-Garcia has earned certifications and credentials that are required to be explained in further detail.

##### CERTIFIED FINANCIAL PLANNER™ (CFP®)

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

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

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

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



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

Business Experience:

- G4 Financial Planning, LLC; Managing Member/Investment Advisor Representative; 06/2023 – Present
- UCF College of Medicine; Standardized Patient Educator; 08/2015-Present
- Plan & Act; Investment Advisor Representative; 11/2020-06/2023
- Plan & Act Pension Advisors; Investment Advisor Representative; 07/2021-06/2023
- Powell Crosley Estate; Actor; 01/2014-05/2023
- Universal Orlando Resort; Actor; 04/2014-05/2021
- Lock Talent; Actor; 09/2017-09/2020
- It’s A Trap!; Performer; 10/2014-01/2016
- Odd-O-Ts; Performer; 07/2014-01/2019
- 1&1, Inc.; Telesales Associate; 02/2014-03/2014
- Mount Hope Estate and Winery; Actor; 06/2013-12/2013

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**Item 3 - Disciplinary Information**

- A. Mr. Gibson-Garcia has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  3. Was found to have been involved in a violation of an investment-related statute or regulation; or
  4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Gibson-Garcia never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Gibson-Garcia has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
  2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Gibson-Garcia has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.
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#### **Item 4 - Other Business Activities**

Henry Gibson-Garcia is also a Standardized Patient Educator with UCF College of Medicine. Approximately 80% of his time is spent on this activity. He will receive separate yet typical compensation for this role. This activity does not represent a conflict of interest

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#### **Item 5 - Additional Compensation**

Mr. Gibson-Garcia does not receive any performance-based fees.

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#### **Item 6 - Supervision**

Since Mr. Gibson-Garcia is the sole owner and investment adviser representative of G4 he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at [henry@g4financialplanning.com](mailto:henry@g4financialplanning.com) or 484-326-4107.

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#### **Item 7 - Requirements for State-Registered Advisors**

- A. Mr. Gibson-Garcia has not been involved in any of the following:
1. an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.

2. Been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.
- B. Mr. Gibson-Garcia has never been the subject of a bankruptcy petition.