Tartan Road Wealth Advisory, LLC

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Form ADV Part 2A Disclosure Brochure
April 15, 2026

This Brochure provides information about the qualifications and business practices of Tartan Road Wealth Advisory, LLC. If you have any questions about its contents, please contact us at (512) 670-6099 or by email at compliance@tartanroadwealth.com

The information has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Tartan Road Wealth Advisory, LLC is registered with the State of Texas. Registration does not imply any level of skill or training. CRD Number: 341219

Item 2: Material Changes

This is TRWA's initial brochure filed in connection with its application for registration with the State of Texas. Since this is the firm's initial filing, there are no prior material changes to report.

Item 3: Table of Contents

Item 4: Advisory Business

Description of Advisory Firm

Tartan Road Wealth Advisory, LLC (hereinafter "TRWA") is an investment advisory registered with the State of Texas. The firm was formed in March of 2026 and is 100% owned by Matthew Goff.

Types of Advisory Services

Portfolio Management Services

TRWA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. TRWA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk assessment
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

TRWA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. TRWA seeks to manage the portfolio to meet the client's stated goals and objectives.

TRWA offers portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

Financial Planning Services

TRWA may also provide financial planning services, including: pro forma cash flow analysis, personal net worth statement creation, review of current asset allocation, recommended asset allocation, investment strategy recommendations, savings strategy recommendations, review of tax efficiency, risk management assessment and recommendations, review of estate planning documents and coordination, insurance review, retirement planning analysis, liquidity and cash reserve planning, and other personal financial planning topics. Financial planning recommendations are tailored to the client's current situation, goals, and objectives. Clients may engage TRWA for financial planning on a fixed-fee or hourly basis, or financial planning may be included as part of an ongoing advisory relationship where appropriate. Clients may implement recommendations through TRWA or through other professionals of their choosing.

Selection of Other Advisers/Private Fund Managers

TRWA may recommend that a client allocate a portion of assets to a third-party investment manager, private fund manager, or other adviser when TRWA believes the recommendation is consistent with the client's objectives, risk tolerance, liquidity needs, time horizon, and overall financial circumstances. In evaluating such managers or investments, TRWA may consider factors such as the manager's investment strategy, experience, historical performance, risk management, fees and expenses, liquidity terms, operational structure, and other qualitative and quantitative factors TRWA deems relevant. Clients are under no obligation to engage any recommended manager or investment. If a client elects to proceed, the client may be required to execute separate account documentation, subscription documents, or other agreements associated with the recommended investment or manager.

Tailored Relationships

TRWA tailors advisory services to the individual needs of clients. Clients may impose reasonable restrictions on investing in certain securities or types of securities.

Wrap Fee Programs

TRWA does not sponsor or participate in any wrap fee programs.

Assets Under Management

As of March 11, 2026, TRWA manages $0 in discretionary assets and $0 in non-discretionary assets.

Item 5: Fees and Compensation

Portfolio Management Fees

TRWA charges an annual investment advisory fee based on a percentage of assets under management. The standard fee schedule is as follows:

Assets Under Management	Annual Fee
$0 to $1,000,000	1.00%
$1,000,001 to $2,000,000	0.80%
$2,000,001 to $3,000,000	0.60%
$3,000,001 and above	0.40%

Fees are negotiable based on the complexity of the client relationship, anticipated future assets, related accounts, and other factors. TRWA may aggregate related accounts for billing purposes. Fees are billed on a tiered basis, meaning the total amount of assets under management is segmented and billed at the corresponding annual fee rate.

Financial Planning Fees

Financial planning services may be offered for a fixed fee, hourly fee, or included as part of the overall advisory relationship.

Hourly planning fees are offered at $300 per hour. Fixed planning fees range from $1,000 to $12,000 depending on the complexity and scope of work. The fee will be determined case by case within that range. Hourly fees may be billed periodically as invoiced, or pursuant to such retainer, deposit, or other billing arrangement. Specific fee arrangements will be set forth in the client agreement or other written agreements with the client. That can include a written scope of work with specific objectives, tasks, analysis, or recommendations to be delivered by the advisor.

The engagement may be priced on a fixed-fee basis, an hourly basis, or included as part of the overall advisory relationship. All related fees will be specified in the applicable engagement documents.

Unless otherwise agreed in writing, fixed-fee engagements shall be paid as follows:

- **50% upon execution of this Agreement; and**
- **50% upon delivery of the planning documents and related deliverables that satisfy the agreed scope of work.**

Hourly fee engagements will be billed monthly in arrears based on documented hours logged by the adviser.

Selection of Other Advisers / Private Fund Managers

When TRWA recommends a third-party investment manager, private fund manager, or other adviser, TRWA generally does not receive separate compensation for making the recommendation unless specifically disclosed to the client in writing. Clients who invest with or engage a recommended manager or investment may incur additional fees and expenses charged by that manager, fund, sponsor, custodian, broker, or other service provider.

Billing and Payment

Portfolio management fees are billed monthly in arrears, generally based on the value of the account as of the last business day of the month, after giving effect to deposits and withdrawals as appropriate. Clients may authorize TRWA to deduct advisory fees directly from their custodial account. In such cases, the qualified custodian will send statements directly to the client at least quarterly showing all disbursements, including advisory fees deducted. Clients may also elect to be billed directly.

Other Fees and Expenses

Clients will incur other fees and expenses in addition to TRWA's advisory fee. These may include custodian fees, brokerage commissions, transaction fees, mutual fund and ETF internal expenses, wire transfer fees, and other fees associated with account maintenance and investments. TRWA does not receive compensation from these other fees unless specifically disclosed to the client in writing.

Termination and Refunds

Either party may terminate the advisory agreement upon written notice in accordance with the terms of the client agreement. To the extent any fixed financial planning fee is paid in advance, any unearned portion will be refunded on a pro rata basis upon termination. Because portfolio management fees are billed in arrears, no prepaid fee refund is generally required. Upon termination, any earned but unpaid fees through the date of termination will remain due and payable, and any fee charged in error will be promptly corrected.

For financial planning agreements, the pro rata portion of earned versus unearned fees will be determined by logged work hours performed by the adviser on the client's planning as a percentage of total estimated hours for the engagement specified in the scope of work.

For hourly engagements, Client shall remain responsible for hourly fees incurred through the date of termination. For fixed-fee engagements, if Adviser has substantially completed the scope of work and delivered the planning documents and related deliverables that satisfy the agreed scope, the remaining unpaid balance shall be due and payable.

Item 6: Performance-Based Fees and Side-By-Side Management

TRWA does not charge performance-based fees.

Item 7: Types of Clients

TRWA generally provides advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations, and pension and profit-sharing plans.

TRWA may impose account minimums in its discretion, but generally reserves the right to waive them.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

Methods of Analysis. TRWA uses a planning-driven and client-specific analytical process when formulating investment advice and managing client portfolios. TRWA's analysis may include one or more of the following methods, depending on the client's objectives, financial circumstances, risk tolerance, liquidity needs, time horizon, tax considerations, account types, and existing holdings.

Financial Planning and Client-Specific Analysis. TRWA analyzes a client's overall financial circumstances, including assets, liabilities, income needs, anticipated withdrawals, time horizon, tax considerations, estate planning considerations, insurance considerations, and other relevant facts. This analysis is used to help determine an appropriate investment strategy, asset allocation, liquidity reserve, and portfolio structure. The primary risk of this method is that the analysis depends on information provided by the client and on assumptions regarding future events, including market returns, inflation, interest rates, tax laws, spending needs, life expectancy, and other factors. If client information is incomplete or assumptions prove inaccurate, the resulting recommendations may not achieve the client's objectives.

Asset Allocation Analysis. TRWA uses asset allocation analysis to determine how a client's portfolio should be allocated among asset classes, which may include public equities, fixed income securities, cash equivalents, real estate-related investments, private investments, and other investment categories where appropriate. TRWA considers expected return, expected volatility, liquidity, income needs, diversification, and the role each asset class is intended to serve in the client's portfolio. The risks of asset allocation analysis include the risk that historical relationships among asset classes may not continue, that diversification may not reduce losses in a particular market environment, that one or more asset classes may underperform, and that the selected allocation may not achieve the client's desired results.

Liquidity and Time Horizon Analysis. TRWA places significant emphasis on matching portfolio holdings to anticipated liquidity needs. Assets expected to be needed in the near term are generally intended to be held in investments that TRWA believes have lower volatility and greater liquidity, while assets intended for longer-term growth may be allocated to investments with greater market risk, volatility, or liquidity constraints. The risks of this method include the possibility that a client's liquidity needs may change unexpectedly, that investments believed to be liquid may become less liquid during periods of market stress, and that more conservative liquidity reserves may underperform growth-oriented assets over time.

Fund, Manager, and Sponsor Analysis. TRWA may evaluate mutual funds, exchange-traded funds, interval funds, private funds, separately managed accounts, third-party managers, sponsors, or asset class specialists. TRWA's review may include investment strategy, portfolio holdings, manager experience, fees and expenses, liquidity terms, performance history, risk controls, reporting, tax characteristics, operational considerations, and other qualitative and quantitative factors. The risks of this method include manager risk, operational risk, strategy risk, style drift, reliance on information provided by third parties, limited transparency, and the possibility that a selected manager, fund, or sponsor may underperform relevant benchmarks, peer groups, or client expectations.

Fundamental, Economic, and Market Analysis. TRWA may consider economic conditions, interest rates, inflation, valuations, market trends, credit conditions, business fundamentals, income characteristics, and other factors when evaluating investments or portfolio structure. The risks of this method include the risk that economic or market judgments may be incorrect, that valuation measures may not predict future returns, that markets may remain overvalued or undervalued for extended periods, and that unexpected events may cause investments to perform differently than anticipated.

Quantitative and Historical Analysis. TRWA may review historical returns, volatility, correlations, drawdowns, income characteristics, valuation data, risk measures, and other quantitative information. The risks of this method include the risk that historical performance and historical relationships may not repeat, that quantitative measures may be incomplete or misleading, and that market behavior may differ materially from prior periods.

Tax-Sensitive Analysis. Where relevant, TRWA may consider tax consequences when making investment recommendations, including account location, realization of gains or losses, tax-loss harvesting opportunities, income tax treatment, and coordination with a client's other tax advisors. The risks of this method include the risk that tax laws may change, that tax considerations may conflict with investment considerations, that tax-loss harvesting may not produce the expected benefit, and that TRWA's analysis may be limited by incomplete tax information. TRWA does not provide legal or tax advice, and clients should consult their attorney, CPA, or other tax professional regarding legal or tax matters.

Investment Strategies

TRWA may use one or more of the following investment strategies, depending on the client's circumstances and investment objectives.

Long-Term Diversified Portfolio Strategy. TRWA generally seeks to build diversified portfolios designed to support a client's long-term financial objectives. Portfolios may include a combination of public equities, fixed income securities, cash equivalents, real estate-related investments, private investments, mutual funds, exchange-traded funds, interval funds, evergreen fund structures, separately managed accounts, and other investment vehicles where appropriate. The risks of this strategy include market risk, loss of principal, underperformance, volatility, inflation risk, liquidity risk, and the risk that the portfolio may not meet the client's objectives.

Active and Passive Investment Strategies. TRWA may recommend both active and passive investment strategies. Active strategies seek to outperform a benchmark or achieve a specific investment objective through security selection, manager discretion, asset allocation, or other active decisions. Passive strategies generally seek to track an index or market segment. Active strategies may underperform benchmarks or passive alternatives, may involve higher fees, and may depend on the skill and judgment of the manager. Passive strategies remain subject to market risk, tracking error, concentration risk, and the risk that the index or market segment being tracked performs poorly.

Third-Party Manager and Pooled Investment Strategy. TRWA may recommend third-party managers, mutual funds, ETFs, interval funds, private funds, or other pooled investment vehicles. These recommendations may be used to obtain exposure to certain asset classes, investment styles, managers, or strategies. The risks of this strategy include manager risk, fund expenses, limited transparency, tax inefficiency, style drift, operational risk, liquidity restrictions, and the risk that the selected vehicle or manager may not perform as expected.

Rebalancing Strategy. TRWA may periodically recommend or implement rebalancing to bring a portfolio closer to its intended allocation. Rebalancing may involve selling investments that have appreciated and buying investments that have declined or become underweighted. The risks of rebalancing include transaction costs, tax consequences, the possibility of selling investments that continue to appreciate, and the possibility of buying investments that continue to decline.

Liquidity Reserve and Cash Management Strategy. TRWA may recommend that clients maintain cash or cash-equivalent reserves for anticipated spending needs, emergencies, taxes, distributions, or other near-term obligations. Cash and cash equivalents may reduce short-term volatility and provide liquidity, but they may also underperform other investments over time and may lose purchasing power due to inflation.

Private Investment Strategy. Where appropriate for a client's financial circumstances, risk tolerance, liquidity needs, investor qualifications, and objectives, TRWA may recommend private investments, including private equity, private credit, private real estate, limited partnerships, interval funds, evergreen structures, or similar vehicles. These investments may be used for diversification, income, growth, or exposure to assets not readily available in public markets. The risks of this strategy include illiquidity, transfer restrictions, long holding periods, valuation uncertainty, limited transparency, capital call obligations, manager dependence, leverage risk, concentration risk, higher fees and expenses, limited regulatory oversight compared to publicly traded securities, delayed or limited reporting, and the possibility of a total loss of invested capital.

Material Risks

All investments involve risk of loss, including the possible loss of principal. TRWA's methods of analysis and investment strategies are intended to help manage risk, but they do not eliminate risk, guarantee a profit, or ensure that a client's objectives will be achieved.

Loss of Principal. Clients may lose some or all of the amount invested. Losses may occur because of market declines, issuer-specific events, credit defaults, interest rate changes, inflation, manager underperformance, liquidity constraints, economic recessions, geopolitical events, or other factors.

Insufficient Liquidity. Liquidity risk is the risk that a client may not be able to sell or access an investment when cash is needed, or may be able to sell only at an unfavorable price. This risk may be greater for private investments, real estate-related investments, interval funds, limited partnerships, evergreen structures, thinly traded securities, and certain fixed income securities during periods of market stress.

Unexpected Portfolio Volatility. Portfolio values may fluctuate more than expected. Volatility may result from equity market declines, interest rate changes, credit spread changes, inflation, economic events, geopolitical events, concentration in certain sectors or asset classes, or correlations among asset classes increasing during periods of stress.

Underperformance Relative to Expectations. A portfolio, asset class, manager, fund, or strategy may underperform expectations, benchmarks, peer groups, inflation, or the client's required return. Underperformance may result from market conditions, poor security selection, manager decisions, fees and expenses, valuation changes, or a mismatch between the strategy and the market environment.

Failure to Achieve Financial Objectives. Even if a portfolio performs positively, it may not achieve the client's financial objectives. This may occur because of investment underperformance, excessive withdrawals, unexpected expenses, changes in tax laws, inflation, longevity, insufficient savings, changes in client circumstances, or assumptions that prove inaccurate.

Market Risk. Publicly traded securities, including equities, ETFs, mutual funds, and fixed income securities, may decline in value due to broad market conditions, investor sentiment, economic developments, interest rate changes, inflation, political events, or other factors.

Equity Risk. Equity securities may fluctuate significantly in value and may decline due to company-specific events, industry conditions, changes in earnings, valuation changes, market sentiment, or general economic conditions. Equity investments may experience greater volatility than fixed income or cash-equivalent investments.

Fixed Income Risk. Fixed income securities are subject to interest rate risk, credit risk, inflation risk, call risk, extension risk, reinvestment risk, and liquidity risk. When interest rates rise, the value of existing fixed income securities generally declines. Lower-quality fixed income securities may involve greater risk of default or loss.

Interest Rate Risk. Changes in interest rates may affect the value of fixed income securities, dividend-paying equities, real estate-related investments, private credit, and other income-producing investments. Rising rates may reduce the value of existing bonds and may place pressure on valuations for other asset classes.

Credit Risk. Credit risk is the risk that an issuer, borrower, or counterparty may fail to make required payments or otherwise default. Credit risk may affect corporate bonds, municipal bonds, private credit, structured credit, real estate debt, and other income-oriented investments.

Inflation Risk. Inflation may reduce the purchasing power of cash, fixed income payments, and portfolio withdrawals. A portfolio that is too conservative may not grow sufficiently to maintain purchasing power over time.

Cash and Cash Equivalent Risk. Cash, money market funds, Treasury bills, and similar investments may provide liquidity and stability, but they may generate returns below inflation and may reduce long-term portfolio growth. Money market funds and cash sweep vehicles may involve fees, yield fluctuations, and, in limited circumstances, loss of principal.

Mutual Fund and ETF Risk. Mutual funds and ETFs are subject to the risks of their underlying holdings. They may also involve management fees, expenses, tracking error, trading premiums or discounts, tax consequences, and strategy-specific risks. ETFs may trade at prices above or below net asset value, particularly during periods of market stress.

Individual Security Risk. Individual stocks, bonds, or other securities may involve greater company-specific, issuer-specific, or security-specific risk than diversified funds. The value of an individual security may decline significantly due to adverse business developments, credit events, management decisions, litigation, regulation, or other factors.

Real Estate-Related Investment Risk. Real estate-related investments may be affected by property values, rents, occupancy, interest rates, financing availability, local market conditions, property taxes, insurance costs, environmental issues, leverage, and manager execution. Publicly traded real estate securities may also be affected by stock market volatility.

Alternative Investment Risk. TRWA may recommend alternative investment strategies or investment vehicles when TRWA believes they are appropriate for a client's objectives, risk tolerance, liquidity needs, time horizon, and overall financial circumstances. Alternative investments may include, but are not limited to, private equity, private credit, real estate-related investments, hedge fund strategies, managed futures or commodity trading advisor strategies, commodities, derivative-based strategies, option-based strategies, long/short strategies, interval funds, evergreen funds, business development companies, and mutual funds or ETFs that pursue alternative investment strategies.

Alternative investments may involve risks that are different from, or greater than, the risks of traditional publicly traded stocks, bonds, mutual funds, or ETFs. These risks may include limited liquidity, restrictions on transfer or redemption, valuation uncertainty, use of leverage, derivatives, short selling, futures contracts, counterparty exposure, margin or collateral requirements, higher fees and expenses, complex tax reporting, less transparency, less frequent reporting, concentration in specialized strategies or markets, reliance on third-party managers, model risk, operational risk, and performance that may differ materially from expectations. Some alternative strategies may be difficult to understand, may perform differently than traditional markets, and may experience losses during periods when they are expected to provide diversification or risk reduction.

Certain alternative investments are publicly traded or offered through mutual funds or ETFs and may provide daily liquidity, but daily liquidity does not eliminate strategy-specific risk. For example, alternative mutual funds or ETFs that use futures, options, commodities, derivatives, leverage, short exposure, or trend-following strategies may experience rapid price changes, tracking differences, tax inefficiencies, or losses that are not closely correlated with traditional equity or fixed income markets. During periods of market stress, alternative strategies may not perform as expected, correlations among asset classes may increase, and liquidity may become more limited.

Alternative investments are not suitable for all clients. Clients may lose some or all of the amount invested in an alternative investment. TRWA's recommendation of an alternative investment strategy does not guarantee that the investment will reduce risk, improve returns, provide income, preserve capital, or achieve a client's financial objectives.

Private Investment Risk. Private investments may involve significant or unusual risks, including illiquidity, transfer restrictions, limited redemption rights, long holding periods, valuation uncertainty, lack of a public market, limited transparency, less frequent reporting, higher fees and expenses, capital call obligations, leverage, concentration, manager dependence, and a greater risk of loss than more traditional publicly traded investments. Clients may be unable to exit a private investment when desired and may lose all or a substantial portion of the investment.

Interval Fund and Evergreen Structure Risk. Interval funds and evergreen private investment structures may offer only limited periodic liquidity, and redemption requests may be subject to limits, gates, proration, suspension, or other restrictions. Net asset values may be based on estimates or less liquid underlying holdings. Investors may not be able to redeem all or part of their investment when requested.

Manager Risk. When TRWA recommends a third-party manager, fund, sponsor, or asset class specialist, clients are subject to the risk that the manager's strategy, judgment, personnel, operations, controls, or execution may not perform as expected. Manager performance may differ materially from historical results.

Valuation Risk. Certain investments, particularly private investments, real estate-related investments, and less liquid securities, may not have readily available market prices. Valuations may be based on estimates, appraisals, models, or information provided by managers or sponsors. Reported values may differ from the amount ultimately realized upon sale or liquidation.

Concentration Risk. A portfolio or investment vehicle may be concentrated in a particular asset class, sector, issuer, manager, geography, or strategy. Concentration may increase the risk of loss if the concentrated exposure performs poorly.

Leverage Risk. Some investments or investment vehicles may use borrowing, derivatives, or other forms of leverage. Leverage may increase returns, but it may also magnify losses and volatility.

Tax Risk. Investment decisions may have tax consequences, including realized gains or losses, taxable income, unrelated business taxable income, state tax issues, or other consequences. Tax laws may change, and tax outcomes may differ from expectations. TRWA does not provide legal or tax advice.

Reliance on Third-Party Information. TRWA may rely on information from clients, custodians, fund managers, sponsors, research providers, and other third parties. If such information is incomplete, inaccurate, delayed, or misleading, TRWA's analysis and recommendations may be affected.

No Guarantee. TRWA does not guarantee the future performance of any investment, portfolio, manager, or strategy. No investment recommendation or investment strategy can assure a profit, prevent loss, or ensure that a client's financial objectives will be achieved.

Item 9: Disciplinary Information

TRWA has no legal or disciplinary events to disclose.

Item 10: Other Financial Industry Activities and Affiliations

TRWA's principal and owner, Matthew Goff, engages in certain business activities outside of TRWA. These activities are disclosed below because they may create actual or potential conflicts of interest

NetWorthy Publishing / Educational Activities
Matthew Goff is also involved in NetWorthy Publishing, LLC, which publishes financial education and related materials. These activities are generally educational in nature and are not part of a separately compensated advisory service offered by TRWA.

Other Advisory Activities / Ark Wealth Management
Matthew Goff is currently affiliated with Ark Wealth Management, LLC as an Investment Advisor Representative during a transition period associated with the launch of TRWA. This overlap may create conflicts relating to time allocation, business opportunities, and the handling of advisory relationships. TRWA seeks to address these potential conflicts through disclosure, compliance oversight, and adherence to fiduciary obligations. Once the transition is complete and the affiliation ends, TRWA will update its disclosures accordingly.

GCASCO, LLC
Matthew W. Goff is the owner of GCASCO, LLC, a limited liability company that was established as Mr. Goff's personally owned business entity. Historically, compensation paid to Mr. Goff for services performed for Ark Wealth Management has been paid to GCASCO, LLC rather than directly to Mr. Goff individually. GCASCO, LLC then pays Mr. Goff compensation, which may include salary and distributions. Advisory fees for services provided by TRWA are expected to be paid to TRWA, not to GCASCO, LLC. GCASCO, LLC may remain active for a period of time in connection with legacy compensation arrangements, transitional business matters, accounting and tax administration, and other non-client-facing business purposes. GCASCO, LLC is not the registered investment adviser providing advisory services to TRWA clients. These arrangements may create potential conflicts of interest because Mr. Goff may have compensation, tax, administrative, or legacy business interests related to GCASCO, LLC that are separate from his advisory activities through TRWA. TRWA seeks to address these potential conflicts by disclosing the relationship, separating TRWA advisory fee billing from GCASCO,

LLC, and ensuring that recommendations to TRWA clients are made based on the client's objectives, risk tolerance, liquidity needs, time horizon, and overall financial circumstances.

Verdis Seed Venture SPV 2024

GCASCO, LLC also serves as the general partner of Verdis Seed Venture SPV, LLC, a special purpose investment vehicle organized to allow a limited group of investors to participate in a private investment opportunity. Verdis Seed Venture SPV, LLC is closed to new investors.

Neither GCASCO, LLC nor Verdis Seed Venture SPV, LLC will offer new advisory clients access to new investment opportunities unless such activity is separately reviewed, disclosed, and handled in accordance with applicable regulatory requirements. If TRWA were to recommend in the future any investment in which Mr. Goff or an affiliated entity has a financial interest or other material relationship, the conflict of interest and any related compensation or economic benefit would be disclosed to the client in writing before the recommendation is implemented.

Insurance Activities
Matthew Goff is also a licensed insurance agent. In that capacity, he may recommend insurance products and may receive insurance-related commissions. This creates a conflict of interest because commissionable products may create a financial incentive to make recommendations that result in additional compensation. Clients are under no obligation to purchase insurance products through Matthew Goff, and TRWA seeks to address this conflict through disclosure and its fiduciary duty to act in the client's best interest.

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

TRWA has adopted a Code of Ethics designed to ensure that the firm and its supervised persons meet their fiduciary obligations and maintain high standards of conduct. The Code of Ethics addresses, among other topics, personal trading, insider trading, confidentiality, gifts and entertainment, and conflicts of interest.

TRWA and its supervised persons may buy or sell securities that are also recommended to clients. This presents a conflict of interest. TRWA seeks to mitigate this conflict through its fiduciary duty, Code of Ethics, and policies designed to ensure that client interests come first.

A copy of TRWA's Code of Ethics will be provided to any client or prospective client upon request.

Item 12: Brokerage Practices

TRWA generally recommends Charles Schwab & Co., Inc. ("Schwab") as custodian and broker for client accounts.

In recommending Schwab, TRWA considers factors such as execution capability, custody services, financial stability, reputation, technology, operational support, and overall service.

Clients are not required to use Schwab, but TRWA may be unable to achieve the same level of efficiency or service with another custodian.

TRWA may receive certain research products, software, technology, and practice management support from Schwab or its affiliates. These benefits may create a conflict of interest because they give TRWA an incentive to recommend Schwab. TRWA addresses this conflict through its fiduciary duty and by recommending Schwab based on a good faith belief that it is in the client's best interest.

TRWA generally aggregates trades when doing so is consistent with best execution and equitable allocation among participating accounts.

Item 13: Review of Accounts

Client accounts are reviewed periodically, generally at least quarterly, and more frequently when market conditions, client circumstances, or investment changes warrant.

Reviews are conducted by Matthew Goff.

Clients will receive account statements directly from the qualified custodian and may also receive performance reports or review materials from TRWA.

Item 14: Client Referrals and Other Compensation

TRWA does not receive cash or other economic benefits from non-clients for providing advisory services, except as otherwise described in this brochure. As described in Item 12, TRWA may receive certain research products, software, technology, and practice management support from Charles Schwab & Co., Inc. or its affiliates in connection with recommending Schwab as custodian. These benefits create a conflict of interest because they provide TRWA with an incentive to recommend Schwab. TRWA addresses this conflict through disclosure and by recommending Schwab based on a good faith belief that it is in the client's best interest.

TRWA does not currently compensate any person who is not an employee for client referrals. If TRWA enters into solicitor, promoter, or referral arrangements in the future, such arrangements will be disclosed and conducted in accordance with applicable law.

TRWA and its investment adviser representatives do not act as finders and do not accept compensation from issuers for introducing investors to investment opportunities. If that were ever to change, TRWA would make the required regulatory filings and disclosures before engaging in such activity.

Item 15: Custody

TRWA does not take physical custody of client funds or securities. If clients authorize TRWA to deduct advisory fees directly from their accounts, TRWA is deemed to have custody solely for that purpose. In such cases, the qualified custodian maintains actual custody of client assets and sends account statements directly to clients at least quarterly. Clients should carefully review custodian statements and compare them to any reports provided by TRWA.

Item 16: Investment Discretion

TRWA may be granted discretionary authority to determine the securities to be bought or sold and the amount of securities to be bought or sold for client accounts.

Discretionary authority is granted by the client through the investment advisory agreement and any applicable account forms.

Clients may impose reasonable limitations on this authority.

Item 17: Voting Client Securities

TRWA does not vote proxies on behalf of clients. Clients retain responsibility for receiving and voting proxies for securities held in their accounts.

Item 18: Financial Information

TRWA does not require or solicit the prepayment of more than $1,200 in fees per client, six months or more in advance.

TRWA has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

Item 19: Requirements for State Registered Advisers

A. Principal Executive Officers and Management Persons
TRWA's principal executive officer and management person is Matthew W. Goff, the firm's owner and principal. Information regarding Mr. Goff's formal education and business background is provided in TRWA's brochure supplement and is incorporated here by reference.

B. Other Business Activities
As described elsewhere in this brochure and in the applicable brochure supplement, Matthew Goff is actively engaged in certain business activities outside of TRWA. These currently include a transitional affiliation with Ark Wealth Management, LLC, to which he currently devotes approximately 8 hours per week, although that time commitment is expected to decline as the transition progresses. Matthew Goff expects to sever this affiliation within the next few months, and TRWA will update its disclosures at that time. Matthew Goff also devotes approximately 2 hours per month to insurance-related activities, approximately 6 hours per week to NetWorthy Publishing, LLC, and approximately 1 hour per week to GCASCO, LLC.

C. Performance-Based Fees
TRWA does not charge performance-based fees.

D. Arbitration, Civil, Self-Regulatory Organization, or Administrative Proceedings
Neither TRWA nor its management persons have been involved in an arbitration claim, civil proceeding, self-regulatory organization proceeding, or administrative proceeding of the type required to be disclosed under this Item that would be material to a client's or prospective client's evaluation of TRWA or the integrity of its management.

E. Relationships with Issuers of Securities
Other than as described in Item 10 of this brochure, neither TRWA nor its management persons currently have any relationship or arrangement with any issuer of securities that is required to be disclosed under this Item. If such a relationship or arrangement arises in the future and is material to the advisory relationship TRWA will provide the required disclosure.