



**Firm Brochure**  
(Part 2A of Form ADV)

***Gerstemeier Financial Group, LLC***

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This brochure provides information about the qualifications and business practices of Gerstemeier Financial Group, LLC (GFG). If you have any questions about the contents of this brochure, please contact us at: (630) 420-6601 or (513) 898-9973 or (239) 330-2584, or by e-mail at: [info@g-fg.com](mailto:info@g-fg.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. Registration does not imply a certain level of skill or training.

Additional information about GFG is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search using the Firm's CRD No. of 127052.

## **Item 2 Material Changes**

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### **Annual Update**

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

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

With this Brochure, GFC is filing for SEC registration as a registered investment adviser.

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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: (630) 420-6601 or (513) 898-9973 or (239) 330-2584 or by e-mail at: [info@gfg.com](mailto:info@gfg.com).

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## **Item 4 Advisory Business**

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### **Firm Description**

Gerstemeier Financial Group, LLC (GFG) was founded in 2003 by Robert Gerstemeier. Robert Gerstemeier and Laura Gerstemeier are investment adviser representatives of GFG.

GFG provides personalized confidential financial planning and investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

GFG is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment advice is an integral part of financial planning. In addition, GFG advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Discretionary Investment advice is provided. However, GFG can agree to non-discretionary authority, and currently does so in providing retirement plan services. GFG does not act as a custodian of client assets. The client maintains asset control. GFG places trades for clients under a limited power of attorney. In providing services to retirement plans, GFG can exercise non-discretionary authority as more fully explained under the Type of Advisory Services below.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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### **Principal Owners**

Robert Gerstemeier is a 100% shareholder.

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### **Types of Advisory Services**

GFG provides financial planning services and investment supervisory services, also known as asset management services. On more than an occasional basis, GFG furnishes advice and provides services to clients on matters not involving securities, such as tax preparation, and trust services that often include estate planning considerations.

As of December 31, 2021, GFG had \$114,197,421 in assets under discretionary management.

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### **Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system as well as notes in their file. Often, Investment Policy Statements (IPS) are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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### **Types of Agreements**

The following agreements define the typical client relationships.

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### **Financial Planning Agreements**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

When GFG provides financial planning services a conflict exists between the interests of the investment adviser and the interests of the client when implementing those recommendations. The client is under no obligation to act upon GFG's recommendation, and if the client elects to act on the recommendation, the client is under no obligation to affect the transaction through GFG. Implementation of the recommendation(s) is at the sole discretion of the client.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately at the rate of \$225 per hour.

GFG also provides hourly financial planning services to clients who need advice on a limited scope.

Investment Management clients are not charged separately for this service.

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### **Investment Management Agreement**

In addition to receiving financial planning services, most clients choose to have GFG also manage their assets on an ongoing basis using discretionary authority in order to obtain ongoing in-depth advice and planning. During initial conversations and the use of data gathering instruments, GFG analyzes each client's individual needs, investment goals or objectives, risk tolerance, and overall financial state of affairs. GFG then develops an asset allocation strategy and may use an investment policy statement in order to build and monitor each client's portfolio. GFG employs diversification and risk analysis techniques to construct and manage a client's portfolio.

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### **Retirement Plan Advisory Agreement**

GFG provides various consulting services to qualified employee benefit plans, their fiduciaries, and plan participants. These types of services are designed to assist plan sponsors in structuring, managing, and optimizing their corporate retirement plans. Each engagement is individually negotiated and customized and may include some or all of the following services: plan design and strategy, plan review and evaluation, investment selection, investment policy design, investment policy statement development, plan fee and cost analysis, plan committee consultation, fiduciary consulting, and participant education and communication.

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**Tax Preparation Agreement**

Tax preparation services can be provided as part of the services in an Investment Management Agreement, Retirement Plan Advisory Agreement, or a Financial Planning Agreement for an additional fee.

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**Asset Management**

If needed, and when appropriate, GFG will reallocate or rebalance the client's accounts on a periodic basis to return the accounts to the initially recommended asset allocation strategy. GFG provides these services on a discretionary basis to individuals, trusts, estates, charitable organizations, and corporations, and on a non-discretionary basis to pension and profit-sharing plans.

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies as described further in Item 8 of this Brochure.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through GFG. Access to IPOs may be provided through the Custodian of client assets.

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**Termination of Agreement**

The client has the right to terminate any agreement within five (5) business days after signing the agreement for no penalty or fee. After five days, either the client or GFG may terminate an agreement at any time upon thirty (30) days written notice. Upon receipt of written notice of cancellation from the client, GFG will complete the outstanding obligations and commitments made by it on behalf of the client. Any prepaid fees will be prorated from the time of termination and the unused portion will be returned to the client. Any earned, unpaid fees will be due and payable to GFG.

**Wrap Program**

GFG does not participate in any wrap fee program.

**Item 5 Fees and Compensation**

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**Description** GFG charges fees as a percentage of assets under management, hourly charges, or fixed fees. GFG believes the fee for services under the Agreement is reasonable in light of the services provided, however, lower fees for comparable services may be available from other sources. In some instances, all GFG fees may be negotiable.

Financial Planning Fixed Fee:

For a financial plan, GFG charges a fixed fee predicated upon the facts known at the start of the engagement based on the scope and complexity of the services needed for Client's stated financial needs and goals. GFG's fee reflects the complexity of each client's particular financial situation by taking into account the amount of services needed by the Client, the types of services, and to what extent the services are needed. The typical fee range is \$1,500 to \$8,000. Actual fees are dependent on a client's needs and individual situation. In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

Financial Planning Hourly Fee: For limited scope financial planning engagements, GFG will charge an hourly rate of \$225 per hour for the time expended to provide the requested services.

Investment Management Fee:

For its investment management services, GFG charges a fee based on the assets under management according to the fee schedule below. GFG may exclude non-managed account balances (i.e. individual, Trust, 529, IRA, 401(k) accounts) when determining the fee.) Some of these non-managed accounts may not have asset management fees. As a result, GFG may be in a conflict of interest when it recommends clients transfer their accounts to be managed by GFG.

As of January 1, 2017, GFG has instituted the following fee schedule:

<u>Total Assets Under Management</u>	<u>Annual %</u>
• First \$1 Million	1.00%
• Next \$2 Million	0.85%
• Next \$2 Million	0.70%
• Next \$5 Million	0.60%
• Amounts above \$10 Million	0.50%

Current client relationships may exist where the fees are higher or lower than the fee schedule above. The minimum annual fee for new clients after January 1, 2017, is \$10,000. Accounts of less than \$1,000,000 may be accepted when the client and the advisor anticipate the client will add funds to the accounts bringing the total to \$1,000,000 within a reasonable time, or the client is receiving financial planning services in addition to investment management services that would otherwise be charged a fee in a separate financial planning agreement. Other exceptions will apply to employees of GFG and their relatives, or relatives and referrals of existing clients or other contacts.

Retirement Plan Consulting Fee:

In the event a client engages GFG to provide retirement plan consulting services, GFG will do so on a fee basis. GFG will charge an annual management fee either as a fixed fee or an assets under management fee based upon a percentage of the market value of the assets GFG is managing. GFG's annual management fee is exclusive of, and in addition to, brokerage commissions, transaction fees and other related costs and expenses that the client may incur. GFG will not receive any portion of these commissions, fees and costs. For retirement plan

consulting clients who pay a fee based upon a percentage of the market value of the assets GFG is managing, GFG's annual management fee will be prorated and charged quarterly in advance and is based upon the market value of the assets GFG is managing on the last day of the previous quarter.

The annual management fee varies, depending upon the market value of the assets under management and the type of services to be rendered. These fees generally will have a minimum charge of \$2,500 per year for clients paying a fixed fee, or the annual fee ranges from 0.50% – 1.00% for clients paying based on a percentage of the market value of the assets GFG is managing. GFG, in its sole discretion, may negotiate to charge a lesser annual management fee based upon certain criteria (e.g., anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention).

#### Tax preparation Fee

GFG's tax preparation services are billed at a rate of \$225 per hour. Minimum fee for tax preparation is \$125. Eligible federal and applicable state returns may be filed electronically. Additional fees may apply.

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#### **Fee Billing**

Fees for GFG's investment management services will be invoiced on a quarterly basis, in advance. Account assets are valued on the last business day of the previous calendar quarter. The first fee will be based upon the value of the account on the last business day of the quarter and will be prorated to cover from the date the account is opened to the end of the first calendar quarter. The fee is deducted from a designated client account directly by the custodian upon GFG's instruction. If a client has more than one account, the fee may be pro-rated between the accounts or deducted from individual accounts as determined by the client or by GFG in the client's best interest. The client must consent in advance to direct debiting of their account(s).

Fees for financial planning are billed with a down payment, typically \$250, before work on the plan begins. An invoice will be submitted upon receipt of the first copy of the draft reports used in the Financial Plan based on the number of hours expended (less the deposit amount). GFG's invoice is due and payable upon receipt. All remaining balances are due and payable upon the delivery of the completed Financial Plan and submission of the final invoice to the Client. GFG accepts payments by check or Client initiated electronic funds transfer.

GFG does not collect \$500 or more 6 mos. or more in advance.

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#### **Other Fees**

Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. GFG does not receive any compensation, from fund companies.

GFG does not receive compensation for the sale of securities or investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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**Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to GFG.

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**Past Due Accounts and Termination of Agreement**

At termination, GFG's investment management services fee will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination. In financial planning engagements, any amount due the client or owing GFG at the time of termination will be determined by the work performed by GFG prior to termination.

GFG reserves the right to stop work on any account that is more than 15 days overdue. In addition, GFG reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in GFG's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## **Item 6 Performance-Based Fees**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

GFG does not use a performance-based fee structure because of the potential conflict of interest. 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.

## **Item 7 Types of Clients**

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**Description**

GFG generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and/or corporations or business entities.

Client relationships vary in scope and length of service.

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**Account Minimums**

The minimum annual fee for investment management engagement is \$10,000 which equates to a minimum account size of \$1,000,000 of assets under management. As mentioned previously, GFG has sole discretion to waive the minimum fee under certain circumstances.

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

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**Methods of Analysis**

Security analysis methods may include charting, 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, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that GFG may use include Morningstar mutual fund information, Morningstar stock information, Dimensional Fund Advisors research reports, Charles Schwab & Company's "SchwabLink" service, Advisor Intelligence, newsletter subscriptions, and the World Wide Web.

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### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively-managed index and exchange-traded funds as the core investments, and then may add tactical allocations to investments to provide further diversification and increased return potential. Portfolios are globally diversified to control the risk associated with individual markets.

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 may execute an Investment Policy Statement that documents their objectives and their desired investment strategy.

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).

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### **Risk of Loss**

All investment programs have certain risks that are borne by the investor and that the investor should be prepared to bear. Our investment approach constantly keeps the risk of loss in mind. Some of the risks associated with GFG's investment strategies stated above are:

#### **Risks of charting analysis**

- **Data Mining Bias:** Given any particular chart, an investor could find just as many indicators that suggest one direction for a particular investment, or the market as a whole, as is suggested for the opposite direction. Using a simple moving average versus an exponential moving average, or using 90 days versus 120 days, etc. can create opposite investment decisions.
- **Subjective Interpretation:** Charts represent a pattern of past prices. There are no strict rules that govern the investment decisions that should be made. Investors must make a subjective interpretation regarding what they see in the chart. No chart is self-explanatory and by itself does not suggest any particular outcome.

#### **Risks of fundamental analysis**

- The problem with fundamental analysis is that you are still making predictions about the future that may not come true.
- Even if an investment looks financially healthy and is relatively cheap compared to its

peers, that doesn't mean that it will always rise in value.

- A stock's price is also determined by the supply and demand of its shares and can have a large impact on the stock price that outweighs its fundamentals.

#### **Risks of technical analysis**

- Technical indicators can provide mixed signals. In some cases, one of the technical indicators will show a buy signal and another indicator will show a sell signal. This can cause confusion in trading decisions.
- Accuracy is not 100%. Technical indicators give possible entry and exit points. When a possible entry or exit point for a stock is suggested, it doesn't guarantee a successful trade. Stocks may decrease after the entry.
- Biased opinions can be present. One technical analyst's opinion may contradict another analyst's opinion for the same stock. The technical methods that are used to analyze stocks can vary from one person to another.

#### **Risks of cyclical analysis**

- Generally, cyclical risks are systemic risks that can broadly affect the stock market.
- Innovations in technology and new political agendas are other factors that can influence stock market cycles.
- Individual businesses and sectors can experience market cycles caused by idiosyncratic risks. Idiosyncratic factors can cause recessions, troughs, and expansions for individual companies or specific areas of the stock market.

#### **Risks of strategic asset allocation**

- Strategic asset allocation is usually structured to obtain a return based on an investor's risk profile over a market cycle (generally defined as greater than 5 years). Strategic asset allocation does not allow for anomalies in the market place and as a result, can under perform the market on a regular basis.

#### **Security Specific Material Risks**

- GFG may recommend traditional exchange-traded funds ("ETF"). Market risk is, perhaps, the most significant risk associated with ETFs. This risk is defined by the day to day fluctuations associated with any exchange traded security, where fluctuations occur in part based on the perception of investors. There are other potential risks associated with Exchange Traded Funds (ETFs) which include, but are not limited to, variance between the NAV and market trading price, participation of APs (Authorized Participants), tracking error and liquidity. These potential risks may have an effect on returns especially in times of extreme volatility.

## **Item 9 Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

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

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### **Financial Industry Activities**

GFG serves its clients only as a registered investment advisor. It is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

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### **Affiliations**

GFG is not affiliated with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

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### **Code of Ethics**

As an investment adviser, GFG operates under a fiduciary standard. We owe our clients the highest duty of loyalty and we rely on each employee to avoid conduct that is or may be inconsistent with that duty. It is also important for all our employees to avoid actions that, while they may not actually involve a conflict of interest or an abuse of a client's trust, may have the appearance of impropriety. GFG has adopted a code of ethics setting forth policies and procedures, including the imposition of restrictions on our employees, to the extent reasonably necessary to prevent certain violations of applicable law. The Code also contains policies and procedures with respect to personal securities transactions of all GFG's supervised persons. These procedures cover transactions in a reportable security in which a supervised person has a beneficial interest in or accounts over which the supervised person exercises control. A copy of our Code of Ethics is available upon request.

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### **Participation or Interest in Client Transactions**

GFG and its employees may buy or sell securities that are also held by clients but do not recommend to clients securities in which GFG or a related person holds a material financial interest in. To mitigate the potential conflict of GFG and its employees holding the same securities as clients, employees are prohibited from trading their own securities ahead of client trades.

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**Personal Trading**

The Chief Compliance Officer of GFG is Robert Gerstemeier. He reviews all employee trades each quarter. His trades are available to be reviewed by the SEC or state securities regulators at any time. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

**Item 12 Brokerage Practices**

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**Selecting Brokerage Firms**

GFG does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. GFG recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

GFG recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab.

GFG does not receive fees or commissions from any of these arrangements. GFG does not receive client referrals from a broker-dealer or third-party.

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**Best Execution**

GFG reviews the execution of trades at each custodian. Trading fees charged by the custodians are also reviewed periodically. GFG does not receive any portion of the trading fees.

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**Soft Dollars**

GFG may recommend that clients establish brokerage accounts with Charles Schwab Institutional (Schwab), to maintain custody of clients' assets and to effect trades for their accounts. Although GFG may recommend that clients establish accounts at Schwab, it is the client's decision for where to custody assets. GFG is independently owned and operated and not affiliated with Schwab.

Schwab provides GFG with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab. These services are not contingent upon GFG committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For GFG client accounts maintained in its custody, Schwab generally does not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab, or that settle into Schwab accounts.

Schwab also makes available to GFG other products and services that benefit GFG but

may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of GFG's accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist GFG in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of GFG's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help GFG manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to GFG. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to GFG. Schwab may also provide other benefits such as educational events or occasional business entertainment of GFG personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, GFG may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

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**Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## Item 13 Review of Accounts

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**Periodic Reviews**

When a client portfolio is established, GFG monitors the securities in the portfolio on an on-going basis and provides formal reviews to the client on a quarterly basis. Account reviews are performed more frequently when market conditions dictate.

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**Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

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**Regular Reports**

Clients receive account statements directly from their account's custodian. Clients also receive periodic communications, not less than on an annual basis, from GFG. The format of the written report from GFG is done at the discretion of GFG but may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

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

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### **Incoming Referrals**

GFG has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

### **Referrals Out**

GFG does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Item 15 Custody**

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### **Definition**

Custody occurs when advisers are authorized to deduct advisory fees directly from a client's account. GFG obtains prior written permission from clients to deduct the quarterly management fees from client accounts, which results in custody of client assets.

The custody rule requires that GFG maintain client funds and securities at qualified custodians. GFG clients are required to open their own accounts so that the client's funds and securities are placed in a separate account for each client under the client's name.

Because GFG has the ability to directly debit fees from a client's account the Firm is considered to have custody over a client's account. However, GFG is not required to meet the financial requirements for custodial advisers because it employs required safeguards. Clients authorize GFG to deduct fees from the account in their client agreement. All assets are held at unaffiliated, qualified custodians. The account's custodian provides statements directly to clients at their physical or email address of record, at least quarterly. And, each time GFG instructs a custodian to debit a client's account for the adviser's fee, GFG sends an invoice itemizing the fee. The client is urged to compare the amount of GFG's fee in their account statement with the invoice sent by GFG.

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients may request the custodian send account statements to them via e-mail.

### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by GFG.

### **Net Worth Statements**

Clients may be provided net worth statements. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

## **Item 16 Investment Discretion**

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### **Discretionary Authority for Trading**

GFG accepts discretionary authority to manage securities accounts on behalf of clients. When GFG accepts this authority, GFG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in client accounts on their behalf so we may promptly implement the investment policy that you have approved.

GFG acts under non-discretionary authority when advising a retirement plan. GFG will consult with the client prior to each trade to obtain concurrence in these engagements.

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### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## **Item 17 Voting Client Securities**

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### **Proxy Votes**

GFG does not vote proxies on securities. Clients are expected to vote their own proxies. GFG will not be required to 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 assets of the Client may be invested from time to time. The Client retains all authority and responsibility for the voting of any such proxies.

When assistance on voting proxies is requested, GFG will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Item 18 Financial Information**

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### **Financial Condition**

GFG does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. GFG nor any related person has been the subject of a bankruptcy petition during the past ten years.

GFG does not accept advisory fee of \$1,200 or more six months or more in advance.



**Firm Brochure Supplement  
(Part 2B of Form ADV)**

**Robert Gerstemeier  
and  
Laura Gerstemeier**

***Gerstemeier Financial Group, LLC***

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7024 Pelican Bay Blvd, Unit F-301, Naples, FL 34108  
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info@g-fg.com*

March 23, 2022

This brochure supplement provides information about Robert Gerstemeier and Laura Gerstemeier that supplements the Gerstemeier Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact us at: (630) 420-6601 or (513) 898-9973 or (239) 330-2584, or by e-mail at: [info@g-fg.com](mailto:info@g-fg.com) if you did not receive the Gerstemeier Financial Group, LLC firm brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Gerstemeier and Laura Gerstemeier is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search using [Mr. Robert Gerstemeier's CRD No. 4664996](#) and [Ms. Laura Gerstemeier's CRD No. 5706938](#).

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## **Education and Business Standards**

GFG requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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## **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

**CPA: Certified Public Accountant** (CPA) CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- minimum college education;
- minimum experience levels; and
- successful passage of the Uniform CPA Examination.

Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services

## **CFP® Certification: CERTIFIED FINANCIAL PLANNER™**

Bob Gerstemeier is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the 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®. To attain the right to use the CFP® marks, an individual must satisfactorily 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 includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances

- 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 in order to maintain the right to continue to use the CFP® 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 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; and
- CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**EA:** Enrolled Agents are enrolled by the Internal Revenue Service and authorized to use the EA designation. EA enrollment requirements:

- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the IRS in a position which regularly interpreted and applied the tax code and its regulations.
- Successfully pass the background check conducted by the IRS
- Continuing Education – Complete 72 hours of continuing education every three years. A minimum of 16 hours must be earned per year, two of which must be on ethics.

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**Robert Gerstemeier, MBA, CFP®, EA**

Born: 8/27/71

**Item 2 Education:**

Certificate in Financial Planning, Florida Institute of Technology, 2001  
 M.B.A., Embry-Riddle University, graduated with honors 2001  
 B.S., Miami University, 1993

**Employment:**

President/Managing Director, Gerstemeier Financial Group, LLC, 4/03 to Present  
 Financial Planning Analyst, Balasa Dinverno Foltz & Hoffman LLC, 1/02 to 5/03  
 U.S. Navy Officer, 5/93 to 12/01.  
 U.S. Navy Reserve Officer 5/03 to Present.

**Item 3 Disciplinary Information:** None

**Item 4 Other Business Activities:** None

**Item 5 Additional Compensation:** None

**Item 6 Supervision:** Robert Gerstemeier is the Chief Compliance Officer for the Firm and carries out the compliance obligations of the Firm. While this could lead to a conflict of interest, the Firm believes it has adequate procedures in place for supervising investment adviser activity.

**Item 7 Requirements for State Registered Advisers:**

- Arbitration Claims: None
- Civil, Self-Regulatory Organization or Administrative Proceeding: None
- Bankruptcy Petition: None

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**Laura Gerstemeier, MBA, CPA**

Born: 7/30/1971

**Item 2 Education:**

M.B.A., University of San Diego, graduated with honors 1999

B.S. Accounting, Miami University, graduated Magna Cum Laude 1993

**Employment:**

Treasurer, Gerstemeier Financial Group, LLC, 8/09 to Present

Operations Director, Gerstemeier Financial Group, LLC, 5/08 to 8/09

Director of Client Service, Resources Global Professionals, 10/00 to 3/07

Chief Financial Officer, In-Q-Tel, Inc., 7/99 to 9/00

Finance Manager, Molecular Biosystems, Inc., 11/97 to 5/99

Senior Auditor, Arthur Andersen, LLP, 5/92 - 11/97

**Item 3 Disciplinary Information:** None

**Item 4 Other Business Activities:** None

**Item 5 Additional Compensation:** None

**Item 6 Supervision:** Laura Gerstemeier is supervised by Robert Gerstemeier, President/Managing Director. He reviews Laura's work through frequent office interactions, as well as remote interactions. He also reviews Laura's activities through our client relationship management system. Robert's contact information is: (513) 898-9973, or rgerstemeier@g-fg.com.

**Item 7 Requirements for State Registered Advisers:**

- Arbitration Claims: None
- Civil, Self-Regulatory Organization or Administrative Proceeding: None
- Bankruptcy Petition: None