

Form ADV Part 3 – Client Relationship Summary

Date: 04/06/2021

Item 1: Introduction

Gasaway Investment Advisors, Inc. (“GIA”) is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS/](https://investor.gov/CRS/) which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? What investment services and advice can you provide me? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Our firm provides discretionary asset management of “retail” client accounts and investment advisory services for retirement plans for small businesses. If you are looking for someone to manage your money for you because you either 1) don’t have the expertise to do it yourself or 2) don’t want to take the time to manage your own account and would prefer to have someone else do it for you, we may be a good fit. If you are someone who enjoys doing it yourself and has the time to do it yourself -or- who wants to “bounce investment ideas” off of an advisor and discuss various stocks, we’re probably not a good fit, although there are advisors and firms out there who do that.

Our firm primarily offers the following investment advisory services to what’s known in the industry as “retail” clients: portfolio management on a discretionary basis. We monitor the markets on an ongoing bases, select and monitor individual investments (generally on a monthly basis using highly rated Mutual Funds and Exchange Traded Funds that pass our screening criteria), then review your portfolio and investment strategy, making changes as we feel appropriate. For small business retirement plans, we generally select and monitor a fund menu and manage models for plan participants in a way that is similar in certain ways to how we manage discretionary accounts.

We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. We do not have a minimum account size, but have found that it is more difficult to properly diversify small accounts below approximately \$10,000. Please also see our Form ADV Part 2A (“Brochure”), specifically Items 4 & 7. You can access this by going to <https://adviserinfo.sec.gov/firm/summary/123807> and clicking on “Part 2 Brochures”

For information on our experience, licenses, education & qualifications and what they mean, see the supplements section of our Brochure, available at: <https://adviserinfo.sec.gov/firm/summary/123807>

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? GIA charges a single asset-based fee for advisory services. Fees are negotiable in certain situations and may vary, but generally will be based on an annual percentage rate of 1.25% of assets under management, with the level of fees declining as assets reach certain breakpoints. (For households with assets under \$50,000 management by GIA, the fee is increased to 1.50%.) This means that the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. On the flip side, if your account decreases in size, our fee goes down, so we have a financial incentive to try to have your account increase in value and not decrease in value. Fees are charged quarterley at the end of your billing period (“in arrears”). We do not charge a transaction fee nor are we charged a transaction fee by the custodian of your account. We also are not incentivized to use or favor any investments or asset types. All of this means that we do not have a financial incentive to either create or to not create transactions in your account or to use certain investments. However, you pay our fees no

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matter what we invest in, no matter whether your account makes (or even loses) money, and even if you do not have any transactions during the billing period. Please also see Items 4, 5, 6, 7 & 8 of our *Brochure*.

In addition to our fees, some investments (e.g., mutual funds, exchange-traded funds, variable annuities, etc.) impose additional fees (e.g., internal management & accounting fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. However, we do realize that any additional fees can hurt your overall performance. Therefore, we attempt to use the lowest cost options and those without transaction fees where we feel it is appropriate. For additional details see Item 10 of our *Brochure*.

So, if you invested \$10,000 with us (presuming the account did not change size at all), we would invest the entire \$10,000 into what we feel is a prudent asset allocation based on your needs. Then, we would charge your account \$150/year (approx. \$37.50 per quarter), with your billing date based on your last name. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.** Please also see our *Brochure* for additional details.

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. Probably the biggest conflict we have is when asked for advice of “should I transfer my money to you or leave it where it’s at?” while a similar common conflict comes in when we are asked “I need to get some money for (whatever reason). Should I take it from my account with you or from some other account?” While we try to give the best advice possible, based on what we feel is in your best interest, you need to be aware that if you transfer money to have us manage it, we will then start charging a fee, while if you leave it where it’s at, we will not. Similarly, if you take money from an account we manage, we will no longer be billing on that money in the future. Therefore, it is generally in our best interest to recommend that you move your investments to us and avoid taking distributions from your account with us, if possible. Again, we will try to ignore this fact and give you the best advice possible, but there is always that conflict.

How do your financial professionals make money? Our financial professionals are paid a salary and a bonus for meeting certain activities based goals. They are not paid (either cash or non-cash) compensation tied to the amount of client assets they service or for products sold to clients. However, the amount of client assets and sales commissions from insurance products do affect the profitability of the business and thus the owner, Jim Gasaway.

Item 4: Disciplinary History

Questions to ask us: As a financial professional, do you have any disciplinary history? For what conduct?

No. We have not had legal and/or disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Your primary contact person is Jim Gasaway, President of GIA. We are not representatives of any broker-dealers. If you have any concerns about how Jim is treating you, you may contact Katie Mallette, Vice-President of GIA.

For additional information on our advisory services, **see our *Brochure* available at <https://adviserinfo.sec.gov/firm/summary/123807> and any individual brochure supplement** your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at (269) 324-0080 | (800) 735-8707.

Exhibit A – Material Changes to Client Relationship Summary - This is the initial version of the Client Relationship Summary. There are no material changes.