

GIBBS WEALTH MANAGEMENT, LLC

<https://gibbswealthria.com> (678) 694-8770

1. INTRODUCTION

Gibbs Wealth Management, LLC (“Gibbs,” “we,” “our”) is an investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

2. WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Gibbs offers discretionary investment advisory services to retail investors. We help you determine your investment goals and risk tolerance and then select an appropriate Model Portfolio available through third-party platforms, including OPS and Orion OCIO. These firms design and maintain the Model Portfolios and implement trades in your account. Gibbs does not select individual securities. We monitor your account on an ongoing basis as part of our standard advisory services.

For certain clients with large, concentrated positions, we may recommend ZEGA to manage an options-based strategy such as hedging or covered-call writing.

We monitor your account on an ongoing basis and review it periodically to ensure it remains aligned with your goals and risk tolerance. You may impose reasonable restrictions on your account; however, because Model Portfolios are created by third-party managers, some restrictions may not be feasible.

We generally require a \$25,000 minimum to open or maintain an account, although, we may waive this minimum at our discretion.

CONVERSATION STARTERS

“Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments for me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?”

[More information: Form ADV Part 2A, Items 4 and 7](#)

3. WHAT FEES WILL I PAY?

Gibbs charges an asset-based advisory fee, billed quarterly in advance, based on the value of your account. Because our fee is based on your assets, we have an incentive to encourage you to increase the assets in your account.

You will also pay additional fees charged by third parties:

- OPS platform fees
- Orion OCIO strategist/management fees
- ZEGA options-strategy fees (if applicable)
- Custodial and transaction fees charged by Schwab or other custodians
- Internal expenses of mutual funds and ETFs

Total fees to you — including our fee, platform fees, and strategist fees — will not exceed 3% annually. 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.

CONVERSATION STARTERS

“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?”

[More information: Form ADV Part 2A, Item 5](#)

4. 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?

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.

- We receive revenue-sharing compensation from OPS and Orion OCIO based on the amount of client assets placed on their platforms.
- Some of our financial professionals are licensed insurance agents and may earn commissions on insurance products.
- We may compensate promoters for testimonials or endorsements.

These arrangements create incentives for us or our financial professionals.

CONVERSATION STARTERS

“How might your conflicts of interest affect me, and how will you address them?”

[More Information: Form ADV Part 2A, Items 10, 12, and 14](#)

5. HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are compensated through:

- Salary and/or advisory fee revenue
- Non-cash recognition awards (e.g., training, events, commemorative items)
- Insurance commissions (if licensed)

They do not receive product-specific sales incentives or compensation tied to recommending particular investments.

6. DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

Yes.

Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTERS

“As a financial professional, do you have any disciplinary history. For what type of conduct?”

7. ADDITIONAL INFORMATION

For additional information about our services, fees, or conflicts, please see our Form ADV Part 2A or visit our website at <https://gibbswealthria.com>. To request a copy of this relationship summary or ask questions, please contact us at (678) 694-8770.

CONVERSATION STARTERS

“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?”