

Item 1: Wrap Fee Program Brochure Appendix  
March 2022



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This brochure provides information about the qualifications and business practices of McGowanGroup Asset Management, Inc. If you have any questions about the contents of this brochure, please contact by telephone at 214-720-4400 or email at [ismaels@themcgowangroup.com](mailto:ismaels@themcgowangroup.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.

Additional information about McGowanGroup Asset Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Please note that the use of the term "Registered Investment Adviser" and description of McGowanGroup Asset Management, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and its employees.

## Item 2: Material Changes to Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure

McGowanGroup Asset Management, Inc. (MGAM) is required to advise you of any material changes to our Firm Brochure ("Brochure") from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure.

Below are the material changes that have occurred since our last annual amendment filed March 2021:

- Since our last annual amendment filing on 03/30/2021, we have updated our total Assets Under Management (AUM) as of close 12/31/2021. This updated information is available in our main ADV 2A Brochure under Item 4(E).
- The CashFlow Units benchmark was updated 7/2021 and the new information is available in our main ADV 2A Brochure located under Item 8(1)
- The Allocation Units benchmark was updated 7/2021 and the new information is available in our main ADV 2A Brochure located under Item 8(2).
- The Long-Term Income Units benchmark was updated 7/2021 and the new available in our main ADV 2A Brochure information is located under Item 8(3).
- The Energy Units discipline was finalized 7/2021 and the new information is located available in our main ADV 2A Brochure under Item 8(5).
- The Total Return Units discipline was finalized 7/2021 and the new information is available in our main ADV 2A Brochure located under Item 8(6).

## Item 3: Table of Contents

| <b><u>Topic:</u></b>  | <b><u>Pages:</u></b> |
|---|----------------------|
| Item 1: Cover Page for Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure .....      | 1                    |
| Item 2: Material Changes to Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure ..... | 2                    |
| Item 3: Table of Contents .....   | 3                    |
| Item 4: Services Fees and Compensation .....  | 4                    |
| Item 5: Account Requirements & Types of Clients.....  | 5                    |
| Item 6: Fee Based Portfolio Management .....  | 6                    |
| Item 7: Additional Information .....  | 7                    |

## Item 4: Service Fees and Compensation

We offer the wrap fee program as described in this Wrap Fee Program Brochure. Our wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

### A. Our Asset Management Wrap Fee Program:

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been agreed upon, we generally review the portfolio at least annually and, if necessary, rebalance the portfolio based upon the client's individual needs, stated goals, and objectives.

On an annualized basis, our firm's fee for continuous portfolio management services will range from .59% - 1.50% with the final fee negotiated according to the Clients' needs and objectives. Our firm's fees are billed quarterly in advance based on the value of the account on the last business day of the previous quarter. Accounts established during the billing cycle will be charged pro-rata based on the initial account balance. Fees are adjusted for larger deposits and withdrawals.

### **MGAM Wrap Fee Schedule**

#### **Single Tier Fee Schedule**

| <u>Assets Under Management</u> | <u>Annual Advisory Fee</u> |
|--------------------------------|----------------------------|
| \$0 - \$10,000,000+            | _____ %                    |

Additionally, clients generally also have the ability to further lower their management rate by consolidating assets. Discounted management rates are usually granted at the thresholds below:

Greater than 1MM - .99%

Greater than 3MM - .88%

Greater than 10MM - .83%

The consolidation breakpoints above result in lower flat rates for all assets held with MGAM at Pershing BNY once the asset base surpasses the breakpoint levels. These rates and thresholds could change at any time upon the discretion of MGAM.

- B. A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services include portfolio management and/or advice concerning selection of other advisers, and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This results in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.
- C. You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm. See ADV 2A under Item 5 (C) for additional information.
- D. Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

## Item 5: Account Requirements and Types of Clients

We impose the following requirement(s) to open or maintain an account:

- We require a minimum consolidation of \$1,000,000 within the first calendar year for our asset management service. Generally, this minimum account balance requirement is not negotiable and would be required throughout the course of the client's relationship with our firm.

Types of clients we typically manage wrap fee accounts on behalf of, include:

- Individuals; High Net Worth Individuals; Trusts, Estates or Charitable Organizations; Pension and Profit Sharing Plans; Corporations, Limited Liability companies and/or other business types.

DOL Conflict of Interest Rules and how it pertains to your IRA Accounts, IRA Rollovers, 401(k) accounts or other accounts covered under ERISA.

- (i) MGAM acknowledges our fiduciary status stated under Section 20(a)(b) of our Master Services Agreement (MSA).
- (ii) MGAM has/and will continue to abide by Standards of Impartial Conduct

- a. Acting in the Client's best interest at all times (e.g., Prudence standards and Loyalty standards)
  - b. Receive reasonable compensation, under Item 4(A), that is fair and level.
  - c. Not making materially misleading statements to clients regarding recommendations, compensation or Conflict of Interests.
- (iii) Any MGAM Conflicts of Interests will be disclosed in our ADV and ADV appendix.

## Item 6: Fee Based Portfolio Management

### A. Disclosure

Our firm and its related persons act as portfolio manager(s) for the wrap fee program(s) previously described in this Wrap Fee Program Brochure. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. We currently do not use outside or third party money managers at this time.

Our firm and supervised persons do act as portfolio manager(s) for a wrap fee program described in this Wrap Fee Program Brochure.

#### (i) Individual Tailoring of Advice to Clients:

We offer general investment advice to clients utilizing our Fee Based Advisory Services.

#### (ii) Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities:

We generally do not allow clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their investment plans and administering their accounts. Exceptions to this rule can be made on a very limited case by case basis dependent on the complexity and specifics of the case.

#### (iii) Participation in Wrap Fee Programs.

We only offer wrap fee accounts to our clients, which are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc. We do not manage non-wrap fee accounts.

#### (iv) Performance-Based Fees & Side by Side Management

We do not charge performance fee to our clients

#### (v) Methods of Analysis and Investment Strategies & Risk of Loss

A detailed description of our methods of analysis, investment strategies and Disclosure of Risk of Loss is in our ADV 2A under Item 8(A).

### B. Review of Accounts

- MGAM clients received at least quarterly account reviews. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies if applicable. Only our Financial Advisors or Portfolio Managers will conduct reviews.

- We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.
- We do provide account reviews to clients. Verbal reports to clients take place on at least an annual basis when we meet with clients who subscribe to our Advisory services.

C. Voting Client Securities

MGAM votes proxies according to the specifications detailed in our ADV 2A under Item 17.

## Item 7: Additional Information

1. There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.
2. McGowan Publishing Co., Inc. ("MPC") owns the copyrights and trademarks related to NetWorth Radio and other investment publications including two prior books. Clients have purchased and or been provided copies of the two previous books. MPC has published two nationally recognized investment reference books and holds the copyrights for Spencer McGowan.
3. MPC owns the database of listeners utilized by our firm to solicit clients. Publications by Spencer McGowan that are available for sale would be published through MPC, a separate entity from our firm.
4. A detailed description of our Code of Ethics, Interest in Client Transactions and Personal Trading is addressed under Item 11 of our ADV 2A.
5. We do not pay referral fees for client referrals.

### Financial Information

We do not require, nor do we solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we have not included a balance sheet for our most recent fiscal year. We have never been the subject of a bankruptcy petition at any time.