

Financial Services Guide

1 FEBRUARY 2019

VERSION 8



LYTHGO CREW WEALTH MANAGEMENT PTY LTD
ABN: 30 144 973 786 AFSL: 370951



LYTHGO CREW
— WEALTH MANAGEMENT —

Issue date

This Financial Services Guide (FSG) is dated 1st of February 2019 and replaces all previous versions.

About this guide

The purpose of this FSG is to provide you with sufficient information to enable you to decide whether to obtain financial services from Lythgo Crew Wealth Management Pty Ltd (Lythgo Crew Wealth Management) or one of our Authorised Representatives.

Within this FSG, we refer to our Authorised Representatives as 'your Financial Adviser'. We have authorised your Financial Adviser to operate on our behalf when providing you with financial services.

Your Financial Adviser may operate their financial advisory business through a corporate structure. Where they do this, we will authorise that entity to act as a Corporate Authorised Representative on our behalf. The main reason for operating with this dual authorisation structure is so that fees and commissions can be paid by Lythgo Crew Wealth Management to your Financial Adviser's business.

Details of your Financial Planner and their Corporate Authorised Representative are set out on the enclosed Adviser Profile. The Adviser Profile forms part of this FSG. Within this FSG, Lythgo Crew Wealth Management, your Financial Adviser and their Corporate Authorised Representative are collectively referred to as 'we', 'our' or 'us'.

This FSG, together with the Adviser Profile, is an important document that is designed to tell you about:

- Who we are
- How you can contact us
- The financial services we offer
- Information we need from you
- The cost of our services and how we are paid
- The Managed Discretionary Account (MDA) service we offer
- What insurances Lythgo Crew Wealth Management holds, and
- What to do if you have a complaint about our services.

About us

Lythgo Crew Wealth Management holds an Australian Financial Services Licence (AFSL) (No: 370951) which authorises us to provide advice and deal in respect of the following financial products:

- Deposit Products (basic and non-basic)
- Derivatives (futures, options, warrants and CFD)
- Foreign Exchange
- Government Debentures, Stocks or Bonds
- Managed Investment Schemes (including investor directed portfolio services (IDPS) and MDA services)

- Securities (shares)
- Standard Margin Lending Facilities
- Life Insurance Products (investment related and risk insurance)
- Superannuation, and
- Retirement Savings Accounts.

The AFSL also authorises us to issue:

- Interests in MDA services.

We are licensed to provide all of the above financial services to both retail and wholesale clients.

The enclosed Adviser Profile sets out the financial services that your Financial Adviser and their Corporate Authorised Representative are authorised on behalf of Lythgo Crew Wealth Management to provide.

Our contact details

You can contact Lythgo Crew Wealth Management by any of the following means:

- In person:** Lythgo Crew Wealth Management
Head Office
Level 2, 117 McLachlan Street
Fortitude Valley QLD 4006
- By mail:** PO Box 111
Newfarm QLD 4005
- Phone:** (07) 3137 1331
- Email:** info@lccwm.com.au

The contact details for your Financial Adviser are set out on the enclosed Adviser Profile.

The financial services we provide

Personal financial advice

If we provide you with personal financial advice (i.e. advice which takes into account your personal objectives, financial situation and needs), we will give you a Statement of Advice (SOA). An SOA is a document that helps a retail client understand, and decide whether to rely on, personal advice. The SOA will set out the advice and the reasoning that led to the advice; information about remuneration and benefits; all conflicts of interest that may affect the advice; and the costs, loss of benefits and other significant consequences when recommending switching between financial products.

If you maintain an ongoing advice relationship with us, then generally we will not provide an SOA for further advice situations unless there have been significant changes to either your personal circumstances or the basis on which the advice has been given. In these circumstances, we will keep a Record of Advice (ROA), a copy of which you can request from your Financial Adviser free of charge at any time.

General financial advice

There may be times where we offer you general financial advice. This advice does not take into account your particular objectives, financial situation or needs and therefore may not be appropriate to you. You need consider this before deciding whether or not to act on the advice.

Product Disclosure Statements

When we provide advice about a particular financial product, we will give you, where appropriate, a Product Disclosure Statement (PDS). A PDS is prepared by or on behalf of the issuer of the financial product and must contain sufficient information so that a retail client may make an informed decision about whether to purchase a financial product. The PDS sets out fees payable, risks, benefits and significant characteristics of the financial product.

Managed Discretionary Account (MDA) service

Lythgo Crew Wealth Management operates an MDA service for those investors who are looking for a professional manager to manage their portfolio on an individual basis. An MDA service is characterised by the following features:

- Clients give money to the MDA Operator (Lythgo Crew Wealth Management)
- The MDA operator has the discretion to invest the client's money in financial products without prior reference to the client for each transaction
- Each client agrees with the MDA Operator that their money will be managed as a discrete portfolio belonging to the client, and
- Each client has an understanding that they will derive benefits from the MDA service, including benefits from the MDA operator's expertise in investment selection and other services offered as part of the MDA service.

MDA services, such as the one operated by Lythgo Crew Wealth Management, are generally suitable for more sophisticated clients who understand the risks associated with trading in the financial markets and financial instruments.

Further information in relation to the MDA service operated by Lythgo Crew Wealth Management is set out on pages 5 to 7 of this FSG.

SMSF establishment and administration service

Lythgo Crew Wealth Management, in conjunction with various providers, offers establishment and administration services for self-managed superannuation funds (SMSF) for those investors who wish to have greater control over their superannuation savings and are prepared to put in the time to be trustee of their own superannuation fund. Our website (www.lythgocrew.com.au) contains a complete list of capabilities for our SMSF service.

Information we need from you

As part of our financial planning process we need to ensure we provide you with appropriate and personalised financial advice. To do this, we need to collect detailed personal and financial information about you using a Fact Find document.

As the holder of an AFSL, we have an obligation under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 to verify your identity. To do this, we may ask you to present identification and other documents, such as your passport or driver's licence. We are required to retain copies of the information we collect.

All information we obtain about you will be held securely and kept strictly confidential at all times. For more information, you can obtain a copy of our Privacy Policy from your Financial Adviser or from our website (www.lythgocrew.com.au).

Can I look at the information on my file?

We maintain a record of all the personal information that you have provided to us, or that we have collected on your behalf, along with any SOAs or ROAs we have prepared. You can request to view your file at any time.

Providing investment instructions to us

You can specify how you would like to give us instructions to buy and sell shares or make other investments, e.g. by telephone, fax or other means. However, for transactions greater than \$25,000 we reserve the right to require that instructions are confirmed in writing.

The cost of our services

The fees charged by us vary depending on the nature and scope of the financial advice and financial products we recommend. This section sets out the maximum amount of fees and charges that could apply for the financial services we provide. All amounts shown are inclusive of GST.

Your Financial Adviser will agree with you the form and amount of any fees and charges before implementing the advice. Details of the fees and charges, including the method of calculating them, will be disclosed at the time the advice is provided or as soon as practicable after that time.

SOA and advice implementation costs

We may charge you for the preparation of an initial SOA and the implementation of the advice. This fee will be negotiated with you before the SOA is prepared and may be up to \$5,000. If the advice is acted upon this fee may be waived or reduced at our discretion. Where there is a significant change in your circumstances and you request further advice from us, a new SOA may need to be provided to you. The

cost of this will be negotiated at the time and may be up to \$2,500. There will be instances where we need to provide further advice during the course of our relationship, in particular where a significant change to your circumstances has occurred. We may charge as much as \$275.00 per hour for these services and we will provide an estimate to you before providing the advice.

Buying and selling shares and derivatives

You can appoint us to act as your agent to buy and sell shares and derivatives (on the Australian Securities Exchange (ASX) or any other prescribed financial market) on your behalf. Following a transaction, you will receive a contract note from the executing broker setting out the details and costs of the transaction (i.e. the amount of brokerage paid).

At the commencement of our arrangement with you, we will agree the brokerage rates with you and we may review them periodically. As a guide, the brokerage paid by you will fall within the following ranges:

Australian Shares	0.11% or \$12.50 to 1.10% or \$110 whichever is greater.
Australian CFD's	0.12% or \$12.50 to 1.00% or \$110 whichever is greater.
Australian Options	Between \$1 and \$20 per contract with a minimum of up to \$100.
Futures	between \$4 and \$25 per lot in the base currency of the contract.
Foreign Exchange	between 1 and 2 pips per side.
US Shares	between 1c and \$1 per share.
US Options	between 1c and \$1 per option.

From the above brokerage, Lythgo Crew Wealth Management may receive a rebate of up to 100% from the broker.

For example, if you traded Australian shares to the value of \$40,000 and we had agreed with you from the outset that your brokerage rates would be 0.55% or \$66 (whichever is greater), the brokerage you would pay to the broker would be \$220. From this \$220, the broker may pay us up to \$220 as a rebate. If you traded Australian shares to the value of \$5,000, the brokerage would be the \$66 and the broker may pay us up to \$66 as a rebate.

In addition, if you engage us to provide an ongoing advisory service, a management fee for any funds invested in shares and derivatives of up to 1.95% p.a. calculated and paid monthly can be charged. For example, if you have a \$100,000 share portfolio and you would like us to provide you with an ongoing direct equities advice, we may charge you up to \$1,950 p.a. (or \$162.50 per month).

MDA service

When shares and derivatives are bought and sold within the MDA service, the above costs for buying and selling shares and derivatives will apply. In addition, a 22% performance incentive fee is charged and invoiced quarterly on any gains made within your portfolio. The performance incentive fee will be earned on the basis of a "high water mark" meaning that Lythgo Crew Wealth Management will only receive the performance incentive fees, on a particular pool of invested money, when its value is greater than its previous greatest value. Should the investment drop in value then Lythgo Crew Wealth Management must bring it back above the previous greatest value before it can receive performance fees again.

For example, if you invested \$100,000 in the MDA service and the value at the end of the first quarter was \$103,000 (i.e. there had been a net gain of \$3,000) Lythgo Crew Wealth Management would deduct \$660 as a performance incentive fee from your account (being 22% of the net gain). If as at the end of the next quarter, your account had declined to \$98,000, no fee would be charged for that quarter. However, if during the following quarter, there was a further net gain of \$7,000 and your portfolio closed at \$105,000 as at the end of the quarter, Lythgo Crew Wealth Management would deduct \$440 of that net gain (being 22% of the \$2,000 net gain above the previous greatest value of \$103,000).

Managed investment and superannuation products

We do not receive any upfront or ongoing commissions for new managed investment and superannuation product recommendations made after 1 July 2014. However, we may negotiate an ongoing advisor service fee up to 1.50% p.a. with you. For example, where a client invests \$10,000 in a new product we will not receive any upfront or ongoing commissions. However, with your consent we may receive an ongoing advisor service fee of up to \$150 p.a. which is usually paid monthly over the course of the year. Where an adviser service fee is agreed to, your adviser will need to gain your permission to continue charging this fee every 2 years by way of a signed client opt in agreement.

For clients with managed investment and superannuation product which were acquired before 1 July 2014, if we recommend an additional contribution, we may receive ongoing commissions and/or advisor service fees of up to 1.50% p.a. For example, where a client invests \$10,000 into an existing product we may receive ongoing commissions and or advisor service fees of up to \$150 p.a. which is usually paid monthly over the course of the year.

Life insurance

The initial commission we receive on life insurance products may be up to 133% of the first year's premium. The ongoing commission we receive may be up to 33% p.a. of the renewal premium.

For example, for an insurance product with an annual premium of \$2,000, the issuer may pay us upfront commission of up to \$2,660 upfront and \$660 p.a. usually paid monthly over the course of the year.

Since 1 July 2014, we are not permitted to receive commissions on group life risk insurance policies inside superannuation or an individual life insurance policy for a member of a default fund, unless we were entitled to receive these payments through existing arrangements with the product issuer which were in place as at 30 June 2014.

SMSF establishment and administration service

If we recommend that you establish an SMSF, the establishment costs may be up to \$6,000 depending on structures, trustee and investment type. The administration costs (charged on an annual basis) may be up to \$3,000 p.a. In some instances we may receive a rebate from our providers of up to 35%.

For example if you were charged \$5,000 for the establishment of a SMSF we may receive \$1,750. If you were charged annual administration fees of \$3,000 we may receive \$1,050.

How our Authorised Representatives are paid

Lythgo Crew Wealth Management's Authorised Representatives will be paid a percentage ranging from 10% to 95% of fees and commissions received by Lythgo Crew Wealth Management from any products or advice (less any general costs of administration or support staff salaries) provided to you and disclosed in the SOA or ROA. This amount will be paid to your Financial Adviser's Corporate Authorised Representative. At times you may receive advice from a Director of Lythgo Crew Wealth Management – in this instance the Directors are remunerated by way of salaries and as such no commission splits are applicable.

On occasions, we may also receive non-monetary benefits from product issuers. However, other than for genuine educational or training purpose and financial services IT software and support, we cannot accept a non-monetary benefit if it is worth more than \$300. Examples of these non-monetary benefits could include sponsorships, lunches, invitations to sporting events, theatre tickets, branded promotional items and occasional gifts such as Christmas hampers and bottles of wine. We maintain a register of all non-monetary benefits we receive between \$100 and \$300. You can view the register at any time on request free of charge.

Additional benefits are not permitted to be paid to your Financial Adviser if they are as a result of, or conditional on, the amount of business they provide to a product issuer. Outside of normal brokerage rebates, Lythgo Crew Wealth Management may be entitled to bonuses, incentives or expense rebates from product issuers based on the total revenue generated from certain products. These amounts are paid out of the product issuer's own administration fees and do not increase the management fees you pay, or the Management Expense Ratio above what you would normally pay if these payments were not made.

Other fees

Online platform fee (Interactive Brokers LLC and Saxo Capital Markets Pty Ltd) – The online trading platforms can access 20 minute delayed data or direct market access (live) prices. You can subscribe to direct market access data directly on the platform for the market of your choice and prices will vary depending on the exchange. For example, access to the ASX live data is charged by Interactive Brokers and Saxo Capital Markets at \$46.75 per month. This fee is paid directly by you to the relevant provider.

Are fees and commissions payable to any third parties?

If you have been referred to us by another person, we may have an arrangement with them to share any fees and commissions we receive in respect of the financial services we provide to you. The amount we share may be up to 50% of the fees and commissions we earn from you. For example, if we earn \$1,500 in fees and commissions as a result of the financial advice we provide to you, we may pay up to \$750 to the person who referred you to us. The amount we pay is referred to as a 'referral fee'. If we pay a referral fee in respect of the advice we are providing to you, we will disclose full details in the SOA we provide to you.

How will Lythgo Crew Wealth Management operate its MDA service?

Before any MDA services can be provided, you must first enter into an MDA contract with Lythgo Crew Wealth Management. The MDA Contract will include an Investment Program that is prepared in accordance with the requirements of Division 3 of Part 7.7 of the **Corporations Act 2001** (i.e. requirements relating to SOAs). The Investment Program will contain the following information:

- The nature and scope of the discretions that Lythgo Crew Wealth Management will be authorised and required to exercise
- Any significant risks associated with the MDA Contract

- The basis on which the MDA Contract is considered to be suitable for you
- Warnings about the importance of any limitations relating to the MDA Contract which you must consider before signing the contract, and
- How the Investment Programme is reviewed annually for relevance in light of the particular clients relevant circumstances.

Each MDA will be established in the name of the client and the client will have legal and beneficial title to the assets of their account. In addition, Lythgo Crew Wealth Management will provide detailed reporting each quarter to each client of the MDA service, or otherwise provide each client with access to up-to-date online account information.

Lythgo Crew reviews its outsourced MDA services on an annual basis. As part of our own internal audit requirements we investigate these providers own internal audit reports that are provided to the public on an annual basis to ascertain that internal controls and regulatory obligations are being met. In the event an audit report reveals a lack of internal or external governance we would immediately review that partnership and seek clarification as to the extent of issues revealed in these reports. Lythgo Crew does not have any conflicted arrangements with any outsourced provider and as such we will endeavour to use the most cost effective and compliant providers at all times.

There is no restriction or minimum period for a client account to be kept open, although some conditions on client funds are in place, including a minimum investment of \$100,000.

This FSG complies with the conditions of the relief contained in ASIC Corporations (Managed Discretionary Account Services) Instrument 2016/968.

Risks associated with using an MDA service

The key risks which impact on the MDA service provided by Lythgo Crew Wealth Management include:

- **Market risk** – market risk represents the risk of adverse movements in markets for the derivatives or the underlying shares or index to which the derivative relates. Market risk is created where a share is held, whether physical or derivative, that creates exposure to movements in the price of the share or market. To help reduce the impact of adverse market movements, Lythgo Crew Wealth Management administers and applies its own proprietary value-at-risk (VAR) model limiting the size of potential losses on an individual trade on a daily and monthly basis which is aimed at preventing ‘above normal’ losses impacting on an individual MDA.
- **Derivatives risk** – the risk of capital loss may be exacerbated as a result of the use of leverage through derivatives which are used to execute the Investment Program. The Investment Program may include trading and investing across a range of interest rate, currency, equity and commodity markets in accordance with the economic and market views held by Lythgo Crew Wealth Management. Lythgo Crew Wealth Management will help to mitigate the market risks from trading with leverage and adverse market moves by operating within a strict money management regime. A more in depth look at various derivative risks can be viewed on the Lythgo Crew Wealth Management MDA brochure available from your Financial Adviser.
- **Liquidity risk** – liquidity is inherent in derivative activities. This is the risk that Lythgo Crew Wealth Management may not be able to, or cannot easily, unwind or offset a particular position at or near the previous market price due to inadequate market depth or because of disruptions in the market place. We manage this risk by way of only trading on licensed exchanges that provide information on the liquidity of assets on an ongoing basis so we can make informed decisions on assets we may trade.
- **Counterparty (credit) risk** – counterparty risk is the risk that a counterparty (the other party with whom a financial product contract is made) will fail to perform contractual obligations (i.e. default in either whole or part) under a contract. Counterparty credit risk can only be assumed on approved counterparties. As a general policy, Lythgo Crew Wealth Management will advise clients that only counterparties rated by independent credit rating agencies that meet minimum rating guidelines (including any client requirements) should be used.
- **Product risk** – there is a risk that Lythgo Crew Wealth Management may not comply with the Investment Program. Lythgo Crew Wealth Management manages this risk of trading outside the approved mandate through a procedure of check and review by the Chief Investment Officer and another senior officer.
- **Research risk** – if the economic or market view held by Lythgo Crew Wealth Management does not prove to be correct, or if these asset classes have period of volatility and declining prices, trading in these assets may result in capital losses. Lythgo Crew Wealth Management helps to reduce the impact of this risk by referring to external research and staying abreast of the relevant corporate and economic environment.
- **Leverage risk** – this is known as margin trading. When short selling or borrowing to increase your leverage you open a margin account, which allows you to borrow money from the brokerage firm using your investment as collateral. The risk of margin trading means your losses can be multiplied and you are at risk of a margin call. If you receive a margin call you will be required to reduce positions or increase the size of your investment to bring your account back in line with pre-determined borrowing guidelines.

As your manager, we control the level of borrowing your account is open too and we employ a number of proprietary risk measures which is aimed at trying to reduce the likelihood that you incur substantial losses and margin calls.

- **Short-selling risk** – short selling is selling shares that you do not own. You do this if you believe the price of the shares is going to decline in the future. You sell at a high price in the hope of buying the shares back when the price declines. In order to short sell, you must borrow the shares from someone who owns them. In return, you pay a fee to the party lending you the shares. If the price of the shares rises, you will also be required to pay a margin to cover the potential loss of being required to buy the shares back at a higher price. When you buy back the shares, the share loan is terminated.

Short selling is more risky than buying shares because the potential losses are unlimited. When someone buys shares, the maximum amount that they can lose is the price they paid for the shares. However, when someone short sells a parcel of shares, they lose more as the price of the shares rise.

We control the level of short selling in your account and we employ a number of proprietary risk measures to try to help avoid substantial losses.

MDA services provided by Andrew Lythgo

If you engage the services of Andrew Lythgo to provide you with an MDA Service, Lythgo Crew Wealth Management will not provide custody services. These services will be provided by Interactive Brokers LLC, Saxo Capital Markets Pty Ltd or another custodian of your choice.

Interactive Brokers LLC conducts its broker/dealer and proprietary trading businesses on over 100 market destinations worldwide. In its broker dealer agency business, Interactive Brokers LLC provides direct access ('online') trade execution and clearing services to institutional and professional traders for a wide variety of electronically traded products including shares, options, futures, foreign exchange, bonds, CFDs and funds worldwide. Interactive Brokers LLC and its affiliates execute nearly 1,000,000 trades per day. Within Australia, Interactive Brokers LLC holds its own AFSL (No: 245574).

Saxo Capital Markets (Australia) Pty Ltd (Saxo Capital Markets) ABN 32 110 128 286, AFSL 280372, is a wholly owned subsidiary of Saxo Bank A/S. They specialise in online trading and investment across global financial markets. Saxo Capital Markets enables private investors and institutional clients to trade FX, CFDs, ETFs, Stocks, Futures, Options and other derivatives via multi-award winning online trading platforms.

As custodian, Interactive Brokers LLC and Saxo Capital Markets will:

- Enter into a client agreement directly with you – Lythgo Crew Wealth Management will assist you with the custodian client agreement documentation and make all of the arrangements for the account to be established and funds deposited
- Custodially hold all of your money and investments on your behalf, and
- Engage directly with you for the opening or closing of an account, deposit or withdrawal of monies and the providing of account statements on a daily and monthly basis.

There may be various corporate actions (e.g. proxy voting and share entitlements) that you will be exposed to during the period you invest. Each relevant provider will notify you electronically through your platform and as your manager, Lythgo Crew Wealth Management, will advise the best course of action.

More information in relation to Interactive Brokers LLC and Saxo Capital Markets can be found on their websites: www.interactivebrokers.com.au and www.saxomarkets.com

MDA services provided by Peter Benson

If you engage the services of Peter Benson to provide you with an MDA Service, Lythgo Crew Wealth Management will not provide custody services. The shares and derivatives purchased on your behalf will be held in your own name and all correspondence in relation to your shares and derivatives will be sent directly to you. Lythgo Crew Wealth Management has an agreement with Phillip Capital AFSL 246827 to be the executing broker for this MDA Service.

What insurance does Lythgo Crew Wealth Management hold?

Lythgo Crew Wealth Management holds a Professional Indemnity (PI) insurance policy for the activities conducted under its AFSL. The PI insurance policy provides coverage in the aggregate of up to \$5 million in accordance with s.912B of the **Corporations Act 2001**, ASIC Regulatory Guide 126 - **Compensation and insurance arrangements for AFS licensees** and the ASIC Class Order [04/194] relating to MDA services.

If your Financial Adviser ceases to be an Authorised Representative of Lythgo Crew Wealth Management and you choose to stay as a client of Lythgo Crew Wealth Management, the PI insurance will continue to cover the work done by your Financial Adviser whilst he was advising on behalf of Lythgo Crew Wealth Management.

How are disputes and complaints handled?

We want to know about any problems or concerns you may have with our services so we can take steps to resolve them. We have an internal and external dispute resolution process. Full details of this process can be obtained from your Financial Adviser or from our website (www.lythgocrew.com.au). This section includes a brief summary of the process.

Initially, if you have a complaint, you should contact your Financial Adviser who will try to address your concerns fairly within 5 business days. If you feel that your Financial Adviser has not responded appropriately or you are having difficulty raising your concerns directly with him/her, you should contact our Complaints Officer through any of the below means. He/she will seek to resolve your complaint as soon as practicable and in any event within 45 days.

In person: Lythgo Crew Wealth Management
Head Office
Level 2, 117 McLachlan Street
Fortitude Valley QLD 4006

By mail: PO Box 111, Newfarm QLD 4005

Phone: (07) 3137 1331

Email: info@lcwm.com.au

Should you feel dissatisfied with the outcome proposed by the Complaints Officer or your complaint has not been resolved to your satisfaction within 45 days, you have the right to escalate your complaint free of charge to our external dispute resolution service (EDRS). Lythgo Crew Wealth Management is a member of the AFCA (Australian Financial Complaints Authority) member number 23625 which is an ASIC approved EDRS that can deal with financial services complaints. AFCA will only consider your complaint after you have given Lythgo Crew Wealth Management the opportunity to consider your complaint.

AFCA can be contacted through any of the following means:

By mail: GPO Box 3, Melbourne VIC 3001

Phone: 1800 931 678 (free call)

Web: www.afca.org.au

Email: info@afca.org.au

Lythgo Crew Wealth Management Pty Ltd » ABN: 30 144 973 786 » AFSL No 370951
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