

## Item 1: Cover Page



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## **Form ADV Part 2A Appendix 1 – Wrap Fee Program Brochure**

Dated: March 27, 2025

This Wrap Fee Program Brochure provides information about the qualifications and business practices of Bridge the Gap Retirement Planners LLC. If you have any questions about the contents of this Brochure, please contact us at (805) 304-9459. 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.

Bridge the Gap Retirement Planners LLC is registered as an Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Bridge the Gap Retirement Planners LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number 316508.

## Item 2: Material Changes

Since the filing of our last annual amendment on 03-15-2024, the following changes have occurred:

- We now utilize Fidelity as a custodian.
- Our mailing address has updated to 2655 First Street, Suite 250 Simi Valley, CA 93065

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Bridge the Gap Retirement Planners LLC.

## Item 3: Table of Contents

<b>Item 1: Cover Page</b>	<b>1</b>
<b>Item 2: Material Changes</b>	<b>2</b>
<b>Item 3: Table of Contents</b>	<b>3</b>
<b>Item 4: Services, Fees and Compensation</b>	<b>4</b>
<b>Item 5: Account Requirements and Types of Clients</b>	<b>7</b>
<b>Item 6: Portfolio Manager Selection and Evaluation</b>	<b>7</b>
<b>Item 7: Client Information Provided to Portfolio Manager</b>	<b>10</b>
<b>Item 8: Client Contact with Portfolio Manager</b>	<b>10</b>
<b>Item 9: Additional Information</b>	<b>11</b>
<b>Item 10 Requirements for State-Registered Advisors</b>	<b>14</b>

## Item 4: Services, Fees and Compensation

### Description of Our Services

Bridge the Gap Retirement Planners, LLC became registered as an Investment Adviser in 2021. Bryan Curry and Andrew Gerhartz are the principal owners of BTGRP. Bryan Curry is the firm's Chief Compliance Officer ("CCO").

As used in this brochure, the words "BTGRP", "we", "our firm", "Advisor" and "us" refer to Bridge the Gap Retirement Planners, LLC and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, capital preservation, growth, income, or growth, and income), risk tolerance, as well as tax considerations.

We primarily advise our Clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in Client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client's request.

When we provide investment management services, Clients grant us limited authority to buy and sell securities on a discretionary basis. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

### Wrap Fee Program Fee Schedule

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Assets under Management	Annual Advisory Fee
\$0 - \$750,000	1.25%
\$750,001 - \$1,500,000	1.00%
Above \$1,500,000	0.75%

The annual advisory fee is paid quarterly in arrears based on the average daily balance of the account(s). Fees are negotiable. The advisory fee is a blended fee schedule. For example, an account valued at \$1,200,000 would pay 1.25% on the first \$750,000 and 1.00% on the next \$450,000.

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods. The fee schedule includes fees for investment management services as well the costs of all brokerage commissions and fees, custodial charges (except those related to custody of alternative investments), spreads, mark-ups and mark-downs, incurred in your account held at the Custodian. No increase in the annual fee schedule shall be effective without prior Client consent.

Advisory fees are directly debited from Client account(s) held at a qualified custodian or Clients may also choose to pay by check, electronic funds or debit/credit card. For Client accounts in which BTGRP directly debits their advisory fee,

- i. The Client will provide written authorization to BTGRP, permitting them to be paid directly for their accounts held by the custodian;
- ii. Each time a fee is directly deducted from a client account, BTGRP will:
  - a. sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account;
  - b. sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee; and
- iii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee. We urge you to carefully review such statements and compare such official custodial records to the invoices we provide you.

A Client Contract may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the engagement.

Although clients may request that we execute transactions for their account through any broker-dealer of their choosing, we generally recommend that clients engage the custodial and brokerage services of National Financial Services, LLC, and Fidelity Brokerage Services, LLC (together with all affiliates, "Fidelity"), member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). We are independently owned and operated and are not affiliated with Fidelity. Fidelity offers independent investment advisers services, which include custody of Client securities, trade execution, clearance and settlement of transactions, and daily research and investment information.

For a full description of our brokerage practices, please see Item 12 in our ADV Part 2A, Firm Brochure.

### **Additional bundled Service Cost Considerations**

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and the fee is not based directly upon transactions in the client's account. The client's fee is bundled with our costs for executing transactions in his or her account(s). This results in a higher advisory fee. 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.

### **Certain Conflicts of Interest Related to Wrap Fees**

The costs of our investment advice, together with the costs of all brokerage commissions and fees, custodial charges (except those related to custody of alternative investments), spreads, mark-ups and mark-downs, incurred in your account held at the Custodian will be absorbed by and are included within the Wrap Fee. BTGRP will retain the remaining amount of the Wrap Fee you pay for our advisory services after our payment of all brokerage commissions incurred in your account. This may create a conflict of interest as we may have an incentive to trade your account less frequently, and/or to invest your account in assets that may be subject to waived or reduced brokerage commissions (if available), resulting in BTGRP retaining a greater portion of the Wrap Fee paid by the Client. To address the foregoing conflicts, we manage your account in strict accordance with your investment objectives and our ongoing fiduciary duty to you.

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. BTGRP does not manage non-wrap accounts. While we believe our Wrap Fees to be reasonable for the services provided, lower fees for comparable services may be available from other sources.

### **Additional Expenses Not Included in the Wrap Program Fee**

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 (e.g., 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, securities transactions or fees for trades executed away from custodian. These fees are not included within the wrap fee you are charged by our firm.

We may invest clients in No Transaction Fee (NTF) funds when available. The NTF funds do not pay the custodian a ticket charge, unlike a regular fund; however, it does incur a higher expense ratio than normal funds. Because we offer our advisory services under a wrap program where we pay all ticket charges incurred, we have a financial interest to minimize these charges.

### **Compensation**

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. BTGRP does not manage non-wrap accounts. We do not pay any referral fees or additional compensation of any kind with respect to referrals of clients to our firm for portfolio management services offered under our Wrap Fee program.

## Item 5: Account Requirements and Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, charitable organizations and businesses.

We do not have a minimum account size requirement to open or maintain an account under our management.

## Item 6: Portfolio Manager Selection and Evaluation

### **Selection and Review of Portfolio Managers**

Investment management services are typically managed, directed, and performed exclusively by BTGRP's in-house portfolio managers. Our portfolio managers are registered as investment advisor representatives of our firm and are retained based on their demonstrated skill and experience in managing client portfolios.

### **Conflicts of Interest Related to Use of In-House Portfolio Managers**

You should be aware that because our in-house portfolio managers will manage your account, we have an incentive to evaluate their performance more favorably than we might otherwise if they were not affiliated with our firm. Likewise, because your portfolio manager is affiliated with our firm, we have a disincentive to terminate their services to your account or to take other negative action as a result of their failure to perform to our expectations.

### **Additional Disclosures Related to our Advisory Business; Performance-Based Fees and Side-by-Side Management; Methods of Analysis, Investment Strategies and Risk of Loss; and Voting of Client Securities**

See Item 4 of this Wrap Fee Program Brochure for information about our advisory business. We offer individualized investment advice to clients that matches their objectives and risk tolerance.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to BTGRP in writing. BTGRP will notify Clients if they are unable to accommodate any requests.

We do not charge any performance-based fees for our services or engage in side-by-side management of accounts.

A brief description of our methods of analysis and primary investment strategies are listed below.

**Modern Portfolio Theory (MPT)** The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.

- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

**Passive and Active Investment Management.** We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in your portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a client's portfolio, but we strive to keep internal fund expenses as low as possible.

### **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.



**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Mutual Funds** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

**Annuities:** An annuity is a contract between you and an insurance company that is designed to meet retirement and other long-range goals, under which you make a lump-sum payment or series of payments. In return, the insurer agrees to make periodic payments to you beginning immediately or at some future date. In a variable annuity, you can choose to invest your purchase payments from among a range of different investment options, typically mutual funds. The rate of return on your purchase payments, and the amount of the periodic payments you eventually receive, will vary depending on the performance of the investment options you have selected.

### **Voting Client Securities**

We do not vote client proxies. Therefore, the client maintains exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 7: Client Information Provided to Portfolio Manager

All accounts are managed by representatives of BTGRP. BTGRP does not use third-party portfolio managers.

## Item 8: Client Contact with Portfolio Manager

We encourage clients to contact us regularly and promptly to discuss any such changes by calling the number on this Brochure.

## Item 9: Additional Information

### **Disciplinary Information & Other Financial Industry Activities and Affiliations**

BTGRP and its management have no disciplinary information to disclose.

Neither BTGRP or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither BTGRP or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Neither BTGRP or its management persons have any relationship or arrangement with any related parties.

BTGRP does not recommend or select other investment advisers for our clients.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, Review of Accounts, Client Referrals and Other Compensation, Financial Information**

#### *Code of Ethics*

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

#### *Code of Ethics Description*

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

#### *Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest*

Our firm, its associates, and any related person is not authorized to recommend to a client or effect a transaction for a client involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

#### *Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest*

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by BTGRP's Chief Compliance Officer in advance of the transaction in an account. BTGRP maintains a copy of access persons' personal securities transactions as required.

#### *Trading Securities at/Around the Same Time as Client's Securities*

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities.

### **Review of Accounts**

Bryan Curry, Partner and CCO of BTGRP, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. BTGRP does not provide specific reports to Clients, other than financial plans. Clients who engage us for investment

management services will have their account(s) reviewed regularly on a quarterly basis by Bryan Curry, Partner and CCO and Andrew Gerhartz, Partner. The account(s) are reviewed with regards to the Client's investment policies and risk tolerance levels.

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

BTGRP does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian.

### **Financial Information**

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition.

BTGRP does not require or solicit prepayment of more than \$500 in fees per Client six months in advance. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

## Item 10 Requirements for State-Registered Advisors

Bridge the Gap Retirement Planners LLC, nor any management person, have any relationship or arrangement with issuers of securities.