

## Item 1 – Cover Page

**G. DeWayne McAnally, LLC**  
5909 NW Expressway Suite 165  
Oklahoma City, OK 73132  
Ph: 888-488-4625  
[www.gdmcanally.com](http://www.gdmcanally.com)

### Wrap Fee Program Brochure

Date of Brochure Appendix: March 24, 2020

---

This wrap fee program brochure provides information about the qualifications and business practices of the firm G. DeWayne McAnally. If you have any questions about the contents of this brochure, please contact Mr. McAnally at 888-488-4625 or at [dewayne@gdmcanally.com](mailto:dewayne@gdmcanally.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 the investment adviser firm G. DeWayne McAnally, LLC is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for our name G. DeWayne McAnally, LLC or our firm CRD number **118511**.

\*Registration as an investment adviser does not imply a certain level of skill or training.

## **Item 2 – Material Changes**

This brochure provides prospective clients with information about G. DeWayne McAnally, LLC that should be considered before or at the time of obtaining our advisory services.

This brochure is required to be updated at least annually, or sooner when material changes to our business take place.

Each year we will deliver to you, by no later than April 30th, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

The summary below discusses only material changes since our last annual update of this brochure dated February 18, 2019:

- No material changes to this Brochure

### Item 3 – Table of Contents

Item 1 – Cover Page .....	1
Item 2 – Material Changes .....	2
Item 3 – Table of Contents .....	3
Item 4 – Services, Fees and Compensation.....	4
Investment Management Services .....	4
Management Fees .....	4
Termination of Agreements .....	5
Item 5 – Account Requirements and Types of Clients .....	5
Minimum Investment Amounts Required .....	5
Types of Clients .....	5
Item 6 – Portfolio Manager Selection and Evaluation.....	5
Limits Advice to Certain Types of Investments.....	6
Tailor Advisory Services to Individual Needs of Clients.....	6
Participation in Wrap Fee Programs .....	6
Client Assets Managed by G. DeWayne McAnally, LLC .....	7
Performance-Based Fees and Side-By-Side Management .....	7
Methods of Analysis .....	7
Charting .....	7
Cyclical .....	7
Fundamental .....	7
Technical .....	7
Investment Strategies .....	7
Risk of Loss.....	8
Voting Client Securities .....	9
Item 7 – Client Information Provided to Portfolio Managers .....	9
Item 8 - Client Contact with Portfolio Managers .....	9
Item 9 - Additional Information.....	9
Disciplinary Information .....	9
Other Financial Industry Activities and Affiliations.....	9
Code of Ethics, Participation in Client Transactions and Personal Trading .....	10
Code of Ethics Summary.....	10
Affiliate and Employee Personal Securities Transactions Disclosure .....	10
Review of Accounts.....	10
Account Reviews and Reviewers .....	10
Statements and Reports.....	11
Client Referrals and Other Compensation.....	11
Financial Information .....	11
Item 10 - Requirements for State-Registered Advisers.....	11
Executive Officer and Management Personnel .....	11
Other Business Activities.....	12
No Performance Based Fees .....	12
No Arbitrations .....	12

## Item 4 – Services, Fees and Compensation

### **Investment Management Services**

The firm G. DeWayne McAnally, LLC provides Investment Management Services by Identifying your needs, goals, risk tolerance, and time horizon and by performing a regular analysis and review of portfolios utilizing a quantitative and qualitative approach. Our firm provides advice concerning the attainment, holdings, management, reinvestment and disposition of cash, securities, and other assets of your portfolio in relationship to the suitability of your financial needs and goals.

Analytical tools, research and software will be used to determine your investment goals and objectives. These tools can address any level of risk from conservative to aggressive portfolios, tailored to fit your financial needs.

The firm G. DeWayne McAnally, LLC provides investment management services through accounts maintained at Charles Schwab & Co., Inc., or other designated custodians. The designated custodian will maintain custody of all funds and securities. Our firm will not have direct access to client funds and securities.

See **Limits to Certain Types of Investments at Item 6-Portfolio Manager Selection and Evaluation**, elsewhere in this Disclosure Brochure Appendix.

### **Management Fees**

The firm G. DeWayne McAnally, LLC offers investment management services for a percentage of assets under management. The fee schedule for this service is:

<b>Assets under management</b>	<b>Annual Fee</b>
Under \$250,000	1.35 %
\$250,000 - \$500,000	1.20 %
\$500,000 - \$750,000	1.05 %
Over \$750,000	0.90 %

Fees are negotiable depending on the needs of the client and complexity of the situation. The exact fee for services will be agreed upon and disclosed in the client agreement prior to services being provided.

Fees for our investment management services are normally billed quarterly in advance based on the value of your account at the end of the previous quarter. Other billing arrangements may be offered. Fees are generally deducted directly from your account. You must provide the custodian with written authorization to have fees deducted from the account and paid to G. DeWayne McAnally, LLC. You will be provided with a fee notification. The fee notification will show the amount of fees for the quarter, the manner in which the fees were deducted, any adjustments to the fees, and explanations of any adjustments. Upon our discretion, you may pay fees directly to our firm. If you pay fees directly, payment is due upon receipt of the billing statement from our firm. Fees will be prorated based on the number of days that services are provided when the account is established or terminated at any time other than the beginning of a calendar quarter. Any hourly fees that are charged will be billed directly to the client after the hourly services have been rendered.

The custodian will send you statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if such fee is deducted directly from your account.

Brokerage commissions and/or transaction ticket fees charged by the custodian (if there are any) will not be billed directly to your account. The firm G. DeWayne McAnally, LLC will not receive any portion of such commissions or fees. In

addition, you may incur certain charges imposed by third parties other than our firm in connection with investments made through the account, including but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, and IRA and qualified retirement plan fees. Management fees charged by our firm are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

The minimum account balance required to open a Managed Account is \$25,000; however, the firm G. DeWayne McAnally may, at its discretion, reduce the minimum managed account balance, and may negotiate fees with employees, or clients. Fees will be charged against the managed assets, including cash balances, money market fund shares and other Managed Account positions.

Although we believe our fees are reasonable in relation to the services provided, you should be aware comparable services may be available from other sources. Fees for our services may be more or less than the cost of purchasing the same services separately through other investment advisers or through other programs offered by us.

### ***Termination of Agreements***

Your agreement may be cancelled at any time, by either party, for any reason, upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. You have the right to terminate an agreement without penalty within five business days after entering the agreement.

## **Item 5 – Account Requirements and Types of Clients**

### **Minimum Investment Amounts Required**

The minimum account balance required to open a Managed Account is \$25,000; however, the firm G. DeWayne McAnally may, at its discretion, reduce the minimum managed account balance. Accounts valued under \$25,000 may be subject to more risk and volatility that can exist with trying to diversify smaller accounts and absorb market fluctuations.

### **Types of Clients**

The firm G. DeWayne McAnally, LLC generally provides investment advice to the following types of clients:

- Individuals
- High-Net Worth Individuals
- Pension and profit sharing plans
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

## **Item 6 – Portfolio Manager Selection and Evaluation**

Our Adviser Representatives Mr. McAnally and Grant Milner act as the portfolio managers for our wrap fee program. Our wrap fee program does not allow for the use of portfolio managers that are not associated with us. Therefore, conflicts of interest present in other wrap fee programs that make available both affiliated and unaffiliated portfolio managers are not present in our program. Because our wrap fee program does not provide for a multitude of outside portfolio managers, we do not have procedures designed to select outside portfolio managers. Many of the disclosures required in the Item 6 Wrap Fee Program Brochure instructions do not apply to us. The disclosures that do apply are answered below.

**Investment Management Services** – The firm G. DeWayne McAnally, LLC provides advisory services in the form of Investment Management Services. Investment Management Services (also commonly referred to as “asset management services”) involve providing clients with continuous and on-going supervision over client accounts. This means that our firm will continuously monitor a client’s account, help clients make investment decisions, and make trades in client accounts when necessary.

### **Limits Advice to Certain Types of Investments**

The firm G. DeWayne McAnally, LLC provides investment advice on the following types of investments:

- No-Load (i.e. no trading fee) and Load-Waived (i.e. trading fee waived) Mutual Fund Shares
- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds and Exchange Traded Funds (ETFs)
- Foreign Issues
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities
- Options contracts on securities
- Interests in partnerships investing in real estate and oil and gas interests

The firm G. DeWayne McAnally, LLC does not provide advice on options contracts on commodities, futures contracts on tangibles or intangibles, or hedge funds and other types of private (i.e. non-registered) securities.

When providing Asset Management Services, the firm will typically construct each client’s account holdings using mutual funds, exchange traded funds (ETFs), bonds, equities and other investment tools, to build diversified portfolios. It is not the firm’s typical investment strategy to attempt to time the market but we may increase cash holdings modestly as deemed appropriate, based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations like: low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations. *(Please refer to Item 6 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

### **Tailor Advisory Services to Individual Needs of Clients**

The firm G. DeWayne McAnally, LLC’s services are always provided based on the individual needs of each client. This means, for example, that you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews and questionnaires to determine the client’s investment objectives and suitability information.

### **Participation in Wrap Fee Programs**

As thoroughly discussed in this brochure, we offer services through both traditional and wrap-fee management programs. In traditional management programs, advisory services are provided for a fee but transaction services are billed separately on a per-transaction basis. In wrap-fee programs, advisory services (including portfolio management or advice regarding selecting other investment advisers) and transaction services are provided for one fee. The firm G. DeWayne McAnally’s asset management program is a wrap-fee program. Whenever a fee is charged to a client for management services (whether wrap fee or non-wrap fee), we receive all or a portion of the fee charged.

From a management perspective, there is not a fundamental difference in the way we manage traditional management accounts versus wrap-fee management accounts. The only significant difference is the way in which transaction expenses are paid.

### **Client Assets Managed by G. DeWayne McAnally, LLC**

The amount of client's assets managed by the firm G. DeWayne McAnally, LLC totaled \$96,775,617 as of December 31, 2019. \$96,775,617 of these assets are managed on a discretionary basis and \$0 are managed on a non-discretionary basis.

### **Performance-Based Fees and Side-By-Side Management**

Item 6 of the Form ADV Part 2 instructions is not applicable to this Disclosure Brochure because the firm G. DeWayne McAnally, LLC **does not charge or accept performance-based fees.** Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

### **Methods of Analysis**

The firm G. DeWayne McAnally, LLC uses the following methods of analysis in formulating investment advice:

Charting. The set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Cyclical. Analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

Fundamental. This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

Technical. This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

### **Investment Strategies**

The firm G. DeWayne McAnally, LLC uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Trading. Investments sold within 30 days.

Option writing including covered options, uncovered options, or spreading strategies. Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time.

### **Risk of Loss**

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through our investment management program.

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.



- **Management Risk** – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

### **Voting Client Securities**

The firm, G. DeWayne McAnally, LLC, will not vote proxies on behalf of your account. While there are some investment advisers that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in accounts managed by our firm.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by our firm.

### **Item 7 – Client Information Provided to Portfolio Managers**

Periodically we may need to provide certain financial information about clients to a portfolio manager. This requirement may be necessary when working with an investment that has certain net worth or income requirements. This information may be supplied to the portfolio manager each year as necessary. The information is only provided to establish financial suitability/wherewithal for the specific investment.

### **Item 8 - Client Contact with Portfolio Managers**

The majority of our asset management activities are conducted by our investment adviser representatives and are not typically outsourced to third parties such as other investment advisory firms or Mutual Fund Managers. Since most of the portfolio management activities are conducted within the firm our Portfolio Managers are available for client consultation on an as needed basis. Please contact the firm to schedule an appointment. Our Investment Adviser representatives may also periodically reach out to Asset Management clients.

In the event that investments such as pooled investment vehicles that have investment/portfolio managers are included in our Asset Management Program these managers are not typically available to our clients for direct contact. We have relationships with those managers' companies and each provides us with points of contact so that we can obtain important information, updates and analysis necessary and relevant for our portfolio decision making process. Periodically we may be in direct contact with an investment's manager to obtain their view on certain market events.

### **Item 9 - Additional Information**

#### **Disciplinary Information**

We have no legal or disciplinary events that are material to your evaluation of our business or the integrity of our management. Therefore, this item is not applicable to our brochure.

#### **Other Financial Industry Activities and Affiliations**

The firm G. DeWayne McAnally, LLC is **not** and does **not** have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), (3) other investment adviser or financial planner, (4) futures commission merchant, commodity pool operator, or commodity trading adviser, (5) banking or thrift institution, (6) accountant or accounting firm, (7) lawyer or law firm, (8) insurance company or agency, (9) pension consultant, (10) real estate broker or dealer, or (11) sponsor or syndicator of limited partnerships.

The firm G. DeWayne McAnally, LLC does not require its adviser representatives to encourage clients to implement investment advice through its clearing firm, Charles Schwab & Co., Inc.

### **Code of Ethics, Participation in Client Transactions and Personal Trading**

#### **Code of Ethics Summary**

All investment advisers are required to establish, maintain and enforce a Code of Ethics. The firm G. DeWayne McAnally, LLC has established a Code of Ethics. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in your best interest at all times. Our firm's fiduciary duty to you is considered the core underlying principle for our Code of Ethics, which also covers our Insider Trading and Personal Securities Transactions Policies and Procedures. We conduct business with the highest level of ethical standards and will comply with all federal and state securities laws at all times. We have the responsibility to make sure that the interests of all clients are placed ahead of our own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to you prior to the provision of any advisory services. We must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give you a summary of our Code of Ethics. However, if you wish to review our Code of Ethics in its entirety, a copy will be provided to you promptly upon receipt of your request.

#### **Affiliate and Employee Personal Securities Transactions Disclosure**

The firm G. DeWayne McAnally, LLC or its associated persons may buy or sell for their personal accounts, investment products identical to those recommended to clients. Any time the firm G. DeWayne McAnally, LLC and related persons may invest in the same securities that are recommended to clients, steps are taken to make sure that the interest of all clients are placed ahead of the investment interests of the firm G. DeWayne McAnally, LLC and its associated persons. The firm requires that transactions for personal accounts of its associated persons in investment products identical to those recommended to clients be placed only after placing transactions for clients. This creates a potential conflict of interest. It is the express policy of the firm that all persons associated in any manner with the firm must place the interests of the firm's clients ahead of the associated person's interests when implementing personal investments.

The firm, G. DeWayne McAnally, LLC and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with the firm G. DeWayne McAnally, LLC unless the information is also available to the investing public upon reasonable inquiry. In order to minimize this conflict of interest, securities recommended by associated persons of the firm are widely held and publicly traded.

### **Review of Accounts**

#### **Account Reviews and Reviewers**

You are required to complete a client profile questionnaire which includes risk tolerance, investment objectives, background information and financial information. We monitor all advisory accounts serviced by our firm to ensure compliance with your objectives and goals. Absent any special circumstances, accounts are typically reviewed, rebalanced and reallocated at least annually for adherence to your investment style. When financial conditions dictate, a reallocation of portfolio assets will be recommended to you for consideration and review. A review with the client is done at least once a year and is normally completed every six months. Under certain conditions an unscheduled review of your account may occur; these conditions include but are not limited to; unusual volatility in the market, change in your goals, family status, or risk tolerance, or at your request.

### ***Statements and Reports***

The account custodian will send trade confirmations to you concurrent with the purchase or sale of securities or mutual funds. The account custodian will also send quarterly statements that will provide you with a detail of portfolio allocation and mutual fund product mix and total value of your investment portfolio.

### **Client Referrals and Other Compensation**

The firm, G. DeWayne McAnally, does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in Item 5 of this Disclosure Brochure. The firm, G. DeWayne McAnally, or its associated persons receive no other forms of compensation in connection with providing investment advice.

### **Financial Information**

This item is not applicable to this brochure. The firm, G. DeWayne McAnally, LLC, does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, the firm, G. DeWayne McAnally, LLC, has not been the subject of a bankruptcy petition at any time.

## **Item 10- Requirements for State-Registered Advisers**

### **Executive Officer and Management Personnel**

G. DeWayne McAnally

Year of Birth: 1950

#### ***Educational Background***

- Graduated from Bethany High School 1968
- Graduated from Southern Nazarene University 1972
- Received Certified Financial Planner Designation 1982

Licenses held: Series 7 (General Securities Representative), Series 24 (General Securities Principal), Series 63 (Uniform Securities Agent State Law)

#### ***Business Background***

- Gary Dewayne McAnally (sole proprietor), Registered Investment Adviser September 1989 - Present
- Gary DeWayne McAnally, Investment Advisory Representative; Anderson & Strudwick from July 2010 – August 2011; Jesup & Lamont Securities Corp. from November 2008 to July 2010  
Gary DeWayne McAnally, Registered Representative; Myers Associates, L.P. August 2011 – January 2012; Anderson & Strudwick, Inc. July 2010 – August 2011; Jesup & Lamont Securities Corp. November 2008 – July 2010; Empire Financial Group, Inc. from July 2001 – November 2008.
- Gary Dewayne McAnally DBA The Advisory Group, insurance sales (since 1978)

**Other Business Activities**

Neither G. DeWayne McAnally, LLC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer. Mr. McAnally and Mr. Milner conduct insurance sales as independent insurance agents. Detailed information regarding Mr. McAnally's and Mr. Milner's business activities is disclosed in Mr. McAnally's and Mr. Milner's forms ADV 2B.

**No Performance Based Fees**

As previously disclosed in Item 6, the firm, G. DeWayne McAnally, LLC, does not charge performance based fees.

**No Arbitrations**

G. DeWayne McAnally, LLC or any of its associated persons have not been the subject of any client arbitrations or similar legal disputes.