

Global Steward Advisors, LLC

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**Contact: Kenneth S Ray
October 23, 2020**

This brochure provides information about the qualifications and business practices of Global Steward Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (717) 560 – 2813 and / or ksrayepg@comcast.net.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority. Registration does not imply a certain level of skill or training.

Additional information about Global Steward Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes since last Annual Update

The last Annual Update to the Global Steward Advisors, LLC brochure was filed 10/12/2020. The following are material changes since our last update. Material changes to the current filing include:

- Change of web site from www.safeira.org to www.globalstewardadvisors.com

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Item 4: Global Steward Advisors, LLC Business

The Principal Owner of Global Steward Advisors, LLC is EPG Agency LLC, a Delaware Series LLC. Global Steward Advisors, Series is a separate series LLC of EPG Agency LLC. The Principal Owner and Managing Member of EPG Agency, LLC is Kenneth S Ray. Mr. Ray is Chief Compliance Officer of Global Steward Advisors, LLC.

EPG Agency LLC, a Delaware Series LLC, Global Steward Advisors, Series was formed October 9, 2009. Registration as an investment advisor became effective January 1, 2010. Global Steward Advisors, LLC markets its services through a Solicitor agreement with other licensed investment advisor representatives and through a marketing brand known as Safe IRA. Certain Global Steward Advisors, LLC management services may be viewed and / or accessed through www.globalstewardadvisors.com.

Advisory Services Offered

Global Steward Advisors, LLC offers 2 versions of a discretionary account management service known as the “Global Growth ETF” and “Global Steward Growth” management services. Both services utilize a diversified portfolio of approximately seven to ten individual securities, more or less, consisting of Exchange Traded Funds (ETFs) and/or common stocks, respectively. The Global Steward Growth strategy primarily invests in individual common stocks or ETFs and seeks to generate monthly income from option writing. Each client, in counsel with their investment advisor representative, determines which Global Steward account type and amount is suitable to their individual objectives. Each discretionary account management service is considered to utilize “active” management as contrasted to “passive” management. Accounts are held at E-Trade Securities and are considered to be “fee based” management services. Advisor does not receive any compensation from transaction commissions payable by client to E-Trade Securities.

Global Steward Advisors, LLC has entered into a co-advisory relationship with AE Wealth Management, LLC (“AEWM”) to provide additional styles of investment advisory services to our clients. This arrangement allows us to access model portfolios, model managers, strategists, third party money managers, and trading services through AEWM’s managed account program. As part of the AEWM program, client provides AEWM discretion to select third party, nonaffiliated investment managers (“Model Managers”) to design and manage model portfolios for client assets. If Global Steward Advisors, LLC offers services through AEWM, we provide client with a copy of AEWM’s disclosure brochure which contains a detailed description of AEWM’s services. Global Steward Advisors, LLC receives a portion of the fee charged to EPG clients who utilize AEWM services.

Any client who wishes to terminate account management of any management service has 5 business days to cancel the contract without penalty. Client may terminate contract at any time. Any securities held in client account at point of termination will be liquidated and converted to money market or equivalent.

Global Growth ETF Managed Account

The Global Growth ETF Managed Account service provides discretionary individualized account management utilizing Exchange Traded Funds (ETFs) tailored to the growth portion of a client's overall portfolio. This management strategy seeks growth while reducing risk of individual stock price decline through diversification in underlying ETF portfolio holdings.

First, we seek to identify a diversified selection of approximately 7 to 10 individual ETFs selected based on factors including, but not limited to:

- past return relative to risk when compared to its peers
- diversification relative to other Global Growth ETF portfolio holdings
- historical consistency of price performance relative to risk
- past performance during market declines
- Geopolitical, broad market, and/or sector specific factors

Advisor may, in its sole discretion, overweight or underweight allocations into specific ETFs including retaining funds in money market based on Advisor's perception of market conditions.

Second, specific individual ETFs are selected on the basis of historic price appreciation when compared to the performance of the S&P 500 and the ETF's peers and relative to historic risk of price decline.

Advisor actively manages portfolio of ETFs and continuously reviews the marketplace of ETFs seeking to identify those with superior growth performance relative to the S&P 500, its peers, and risk.

There can be no assurance that advisor will be successful in any of its investment management strategies and client assumes the risk of loss of capital.

Global Steward Growth Managed Account

The Global Steward Managed Account service provides discretionary individualized account management tailored to the growth portion of a client's overall portfolio. There are three levels of management involved with the Global Steward Growth account.

First, we seek to identify a diversified selection of 7 to 10 individual stocks and/or ETFs. Individual stocks are selected based on factors including, but not limited to:

- Consistent forecast earnings growth in excess of 15% per year
- Financial strength
- Industry leadership
- Unique product positioning
- Geopolitical and/or industry specific factors

Advisor may, in its' sole discretion, overweight or underweight allocations into specific asset classes based on Advisor's perception of market conditions.

Second, Specific Individual Securities are selected on the basis of fundamental analysis and / or (in the case of ETFs) their correlation to underlying assets.

Third, the "Global Steward Growth" management style uses short term option writing, seeking to enhance income and reduce portfolio volatility, by selling near term options based on short term pattern recognition.

There can be no assurance that advisor will be successful in any of its investment management strategies and client assumes the risk of loss of capital.

Amount of Assets Managed

Advisor currently manages approximately \$12.1 million of securities using the Global Steward management service on a fee only discretionary basis.

Advisor provides services to individuals, trusts, pensions, for profit and non – profit organizations. Account minimum is \$25,000 for each of the Global Growth ETF managed accounts and \$80,000 for each of the Global Steward Growth managed accounts unless minimum is waived by Advisor.

Global Steward Advisors, LLC manages Global Steward Growth for many clients of Life Stewardship Advisors, a registered investment adviser under the Pennsylvania Securities Act of 1972. Global Steward Advisors, LLC provides compensation to Michael D. Novak, a licensed IAR of Life Stewardship Advisors, through a Solicitor's Agreement.

Item 5: Fees and Compensation to Advisor

Advisor charges the following fees monthly in arrears for all managed securities accounts. Fees are calculated on the basis of the value of the account at the end of the month. Accounts having assets managed less than the full month are charged based on the pro-rata portion of the month the assets were managed. Fees are deducted directly from the account on or about the first day of each month. Client may request direct payment of fees by means other than deduction from account by special exception.

Global Steward Management Fee Schedule

<u>Aggregate Amount</u>		<u>Monthly Fee</u>
\$ 0 -	\$ 149,999	.215%
\$ 150,000 -	\$ 299,999	.190%
\$ 300,000 -	\$ 499,999	.160%
\$ 500,000 -	\$ 749,999	.135%
\$ 750,000 -	\$ 999,999	.120%
\$1,000,000 -	\$1,499,999	.10%
\$1,500,000 -	above	negotiable

Client will additionally incur transaction charges, custodial fees or other fees charged by brokerage firm where client account is held. Global Steward Advisors does not receive any remuneration whatsoever from any of these fees. Refer to Item 12 of this brochure for further information describing brokerage practices.

Item 6: Performance Based Fees and Side-By-Side Management

Advisor does not charge performance-based fees or engage in side-by-side management.

Item 7: Types of Clients

Clients of Global Steward Advisors, LLC include individuals, individual retirement plans, individual trusts and pension plans.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

“Global Growth ETF” managed account services

Each of the Global Steward managed account services provide discretionary individualized account management tailored to the growth portion of a client’s overall portfolio.

The Global Growth ETF Managed Account service provides discretionary individualized account management utilizing Exchange Traded Funds (ETFs) tailored to the growth portion of a client’s overall portfolio. This management strategy seeks growth while reducing risk of individual stock price decline through diversification in underlying ETF portfolio holdings.

Advisor seeks to identify a diversified selection of approximately 7 to 10 individual ETFs selected based on factors including, but not limited to:

- past return relative to risk when compared to its’ peers
- diversification relative to other Global Growth ETF portfolio holdings
- historical consistency of price performance relative to risk
- past performance during market declines
- Geopolitical, broad market, and/or industry specific factors

Advisor may, in its’ sole discretion, overweight or underweight allocations into specific ETFs including retaining funds in money market based on Advisor's perception of market conditions.

Specific individual ETFs are selected on the basis of historic price appreciation when compared to the performance of the S&P 500 and the ETF’s peers and relative to historic risk of price decline.

Advisor actively manages portfolio of ETFs and continuously reviews the marketplace of ETFs seeking to identify those with superior growth performance relative to the S&P 500, its peers, and risk.

There can be no assurance that advisor will be successful in any of its investment management strategies and client assumes the risk of loss of capital.

“Global Steward Growth” managed account services

There are three levels of management involved with the Global Steward Growth account.

First, we seek to identify a diversified selection of 7 to 10 individual stocks and/or ETFs. Individual stocks are selected based on factors including, but not limited to:

- Consistent forecast earnings growth in excess of 15% per year
- Financial strength
- Industry leadership
- Unique product positioning
- Geopolitical and/or industry specific factors

Advisor may in its' sole discretion overweight or underweight allocations into specific asset classes based on Advisor's perception of market conditions.

Second, specific individual securities are selected on the basis of fundamental analysis and / or consensus analyst forecast earnings growth.

Third, the “Global Steward Growth” management style uses short term option writing, seeking to enhance income and reduce portfolio volatility, by selling near term options based on short term pattern recognition.

Investment concentrated in a relatively small quantity of individual securities may involve risk due to unforeseen circumstances. If such negative developments occur, then the proportionate impact on one's individual portfolio might be larger than if one had widely diversified holdings in a portfolio.

There can be no assurance that advisor will be successful in any of its investment management strategies and client assumes the risk of loss of capital.

Item 9: Disciplinary Information

From in or about March 2011 until September 2013 Global Steward Advisors, LLC failed to register one employee as an investment adviser representative in Pennsylvania.

Because EPG employed one unregistered investment adviser representative, the Pennsylvania Department of Banking and Securities imposed a sanction on EPG consisting of an administrative assessment of \$10,000.

Without admitting or denying or denying the allegation, Global Steward Advisors, LLC paid the assessment.

Item 10: Other Financial Industry Activities and Affiliations

Kenneth S Ray is primary owner, and managing member and a licensed agent of EPG Agency, LLC, an independent insurance agency. His investment allocations may include a portion of a client portfolio allocated to "secure" investments provided by the insurance industry and for which he receives commission compensation.

Mr. Ray is managing member of EPG Agency, LLC, Safe IRA Series, an entity which owns the Safe IRA marketing brand including www.globalstewardadvisors.com, a website through which Global Steward Advisors, LLC management services are disclosed.

Ken has served on the National Association of Business Economists Survey Committee and currently serves on the Capstone Foundation Executive Committee and Liberty Counseling and Consulting board of directors. Ken is an advisor to Cornerstone Ministries, a caregiving ministry of the Old Order Amish Church.

Global Steward Advisors, LLC manages Global Steward accounts for many clients of Life Stewardship Advisors, a registered investment adviser under the Pennsylvania Securities Act of 1972. Global Steward Advisors, LLC provides compensation to Michael D. Novak, a licensed IAR of Life Stewardship Advisors, through a Solicitor's Agreement.

Item 11: Code of Ethics

All officers, directors and employees of Global Steward Advisors, LLC are subject to a Code of Ethics. A copy of the Global Steward Advisors, LLC Code of Ethics is available to any Client of prospective Client upon request.

Participation Interest in Client Transactions

All officers, directors and employees of Global Steward Advisors, LLC may invest in the same securities as Clients of Global Steward Advisors, LLC. If any potential conflict of interest occurs, Client transactions will be considered preferential. It is further noted that Applicant is in and shall be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Applicant has adopted a firm wide policy outlining insider trading compliance by Applicant and associated persons and other employees. this statement has been distributed to all associated persons and employees of Applicant and has been signed and dated by each person. A copy of such firm wide policy is left with each person and the original is maintained in a master file. Further, Applicant has adopted a written supervisory procedures statement highlighting the steps to be taken to implement the firm wide policy. These materials are also distributed to all

associated persons and employees of Applicant, are signed and dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to the files, (2) providing continuing education, (3) restricting and / or monitoring trading on those securities of which Applicant's employees may have non-public information, (4) requiring all of Applicant's employees to conduct all of their trading through a specified broker or reporting all of their trading promptly to Applicant and (5) monitoring the securities trading of the firm and its' employees or associated persons.

Personal Trading

All officers, directors and employees of Global Steward Advisors, LLC may invest in the same securities as Clients of Global Steward Advisors, LLC. When so doing, they shall submit to Kenneth S Ray a report of every securities transaction in which they, their families (including the spouse, minor children and adults living in the same household as the officer, director or employee), and trusts of which they are trustees or in which they have a beneficial interest have participated within ten days after such transaction. The report shall include the name of the security, date of the transaction, quantity, price, and broker/ dealer through which the transaction was affected. The requirement may be satisfied by sending duplicate confirmations of such trade to Kenneth S. Ray.

Item 12: Brokerage Practices

Advisor recommends E-Trade discount brokerage services based on overall cost and quality of services provided by E-Trade. Considerations include transaction costs, transaction speed of execution, access to 24X7 online account information, customer service, tax reporting of investment account performance, availability of electronic statements and accessibility. Advisor utilizes "block trading" through E-Trade to aggregate transactions. Advisor receives no compensation, research services, soft dollar benefits, referrals, products or remuneration whatsoever for its referral of clients to E-Trade.

Item 13: Review of Client Accounts

Review of actively managed accounts occurs on an ongoing basis. After individualized asset allocations are determined and funds are invested, Advisor manages specific positions on the basis of block transactions; i.e., all Client accounts holding the same type of security purchase and sell the security during the same block transaction. Following such transactions, positions are allocated on a pro rata basis. In person Client reviews also occur. Frequency may vary between quarterly and annually dependent on Client needs.

Item 14: Client Referrals and Other Compensation

A portion of management fees is paid to licensed Solicitors and / or Investment Advisor Representatives for Client referrals.

Item 15: Custody

Applicant relies on the three-prong safe harbor of 83-46cc (Lawwill, Sena & Weller, Inc. and Investment Counsel Association of America, Inc.) to allow the position that Applicant does not have custody. (1) Client provides a written authorization permitting advisor's fees to be paid directly from the Client's account by an independent custodian or trustee, (2) applicant sends to the client and the custodian or trustee at the same time a bill showing the amount of the fee, the value of the client's assets on which the fee is based and the specific manner in which the advisor's fee was calculated and (3) the custodian or trustee agrees to send to Client a statement no less than quarterly indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the advisor.

Global Steward Advisors, LLC is deemed to have "limited" custody when its fees are debited by a qualified custodian.

Client may terminate an investment advisory contract at any time. Such termination shall be effective immediately upon date of receipt of written notice by Global Steward Advisors, LLC whereupon the pro rata portion of monthly or quarterly fees shall be removed from the account in accordance with the three-prong safe harbor of 83-46cc procedure described above.

Item 16: Investment Discretion

Advisor requires discretionary management authority to actively manage the Global Steward accounts.

Advisor manages discretionary accounts according to a non-exclusive safe harbor exemption from the definition of an investment company under section 5 of the Securities Act of 1933 with respect to programs that are organized and operated in the manner described in rule 3a 4.

1. Each client's account in the program is managed on the basis of the client's financial situation and investment objectives and in accordance with any reasonable restrictions imposed by the client on the management of the account.
2. Suitability considerations:
 - i. At the opening of the account, the Advisor obtains information from the client regarding the client's financial situation and investment objectives, and gives the client the opportunity to impose reasonable restrictions on the management of the account;
 - ii. At least annually, the Advisor contacts the client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether

the client wishes to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions:

iii. At least quarterly, the Advisor notifies the client in writing to contact the Advisor or such other person if there have been any changes in the client's financial situation or investment objectives, or if the client wishes to impose any reasonable restrictions on the management of the client's account or reasonably modify existing restrictions, and provides the client with a means through which such contact may be made; and

iv. The sponsor and personnel of the manager of the client's account who are knowledgeable about the account and its management are reasonably available to the client for consultation.

3. Each client has the ability to impose reasonable restrictions on the management of the client's account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account; Provided, however, that nothing in this section requires that a client have the ability to require that particular securities or types of securities be purchased for the account.

4. The Advisor provides each client with a statement, at least quarterly, containing a description of all activity in the client's account during the preceding period, including all transactions made on behalf of the account, all contributions and withdrawals made by the client, all fees and expenses charged to the account, and the value of the account at the beginning and end of the period.

5. Each client retains, with respect to all securities and funds in the account, to the same extent as if the client held the securities and funds outside the program, the right to:

i. Withdrawal securities or cash;

ii. Vote securities, or delegate the authority to vote securities to another person;

iii. Be provided in a timely manner with a written confirmation or other notification of each securities transaction, and all other documents required by law to be provided to security holder; and

iv. Proceed directly as a security holder against the issuer of any security in the client's account and not be obligated to join any person involved in the operation of the program, or any other client of the program, as a condition precedent to initiating such proceeding.

Item 17: Voting Client Securities

Advisor does not vote any Client securities.

Item 18: Financial Information

Global Steward Advisors, LLC does not receive advisory fees in advance. There is no financial condition that is reasonably likely to impair Global Steward Advisor's ability to meet contractual commitments to clients.

Global Steward Advisors, LLC and Kenneth S Ray, Managing Member and CCO, have never been subject to a bankruptcy petition.

Item 19: Requirements for State-Registered Advisers

Kenneth S. Ray has more than 40 years of experience helping families achieve their financial and estate planning objectives. Ken has served as Vice President, Investments of a national brokerage firm, received a patent for developing advanced investment management technologies, managed two mutual funds and authored The New Investment Manager (Amazon.com).

Ken founded Estate Protection Group, LLC, including EPG Agency LLC and EPG Advisory, LLC in 2004 to provide families with a blend of legal, financial and health care protection resources. Mr. Ray devotes approximately 30 hours per month in service to EPG Agency, LLC. He serves as managing member of Safe IRA, a financial services marketing brand and devotes approximately 10 hours per month to Safe IRA. Mr. Ray's involvement with EPG Agency, LLC and Safe IRA are complimentary to his work with Global Steward Advisors, LLC. He is on the Executive Leadership Council for Capstone Legacy Foundation. Mr. Ray's academic training includes a B.A. (Psychology and Business), Lycoming College, 1976 and M.Ed., Temple University, 1986, Santa Fe Institute, Summer Program, 1993 and 1999.

Mr. Ray does not receive any performance-based fees.

Mr. Ray does not have any relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Mr. Ray has never been involved in any activity resulting in an arbitration claim alleging damages of any amount or in excess of \$2,500 for an investment or an investment related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, extortion or dishonest, unfair or unethical practices.

Mr. Ray has never been subject to any bankruptcy proceeding.

Kenneth S. Ray

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**Form ADV Part 2B
Brochure
Supplement
October 23, 2020**

This Brochure Supplement provides information about Kenneth S. Ray that supplements the Global Steward Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Kenneth S. Ray, if you did not receive Global Steward Advisors, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Kenneth S Ray is available on the SEC's website at www.adviserinfo.sec.gov.

Education Background and Business Experience

Kenneth S. Ray was born in 1954. He graduated from Lycoming College in 1986 with a B.A. (Psychology, Business) and from Temple University, 1986 with a Master's degree (M.Ed.), Santa Fe Institute, 1993, 1999. He has been a registered investment advisor managing investment portfolios since 1993.

Disciplinary Information

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. Kenneth S Ray.

Global Steward Advisors, LLC was registered on October 28, 2009 as an investment adviser under the Pennsylvania Securities Act of 1972. Kenneth S Ray was the sole investment adviser and, by default, placed in the role serving as Chief Compliance Officer. During this first year, Mr. Ray met with Michael D Novak, CFP and they jointly determined to create a business partnership dba Life Stewardship Advisors and utilizing Global Steward Advisors, LLC. At that time Mr. Novak was a Series 63, 65 and Series 7 licensed broker and investment advisor through Securities America.

From in or about March 2011 until September 2013 Global Steward Advisors, LLC failed to properly register Mr. Novak as an investment adviser representative in Pennsylvania.

Because EPG employed Mr. Novak as an unregistered investment adviser representative and, therefore, Mr. Ray serving as Chief Compliance Officer of Global Steward Advisors, LLC, the Pennsylvania Department of Banking and Securities imposed a sanction on EPG consisting of an administrative assessment of \$10,000. Without admitting or denying or denying the allegation, Global Steward Advisors, LLC paid the assessment.

Mr. Ray does not have any relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Item 7 A. Mr. Ray has never been involved in any activity resulting in an arbitration claim alleging damages of any amount or in excess of \$2,500 for an investment or an investment related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, extortion or dishonest, unfair or unethical practices.

Item 7 B. Mr. Ray has never been subject to any bankruptcy proceeding.

Other Business Activities

A. Kenneth S. Ray is the manager of a marketing brand known as Safe IRA which utilizes a web site www.globalstewardadvisors.com to identify currently available fixed annuity products. These fixed annuity products may be offered to clients through EPG Agency,

LLC, a licensed insurance agency in which Mr. Ray is managing member and majority owner. EPG Agency, LLC seeks to identify current offerings of Fixed Equity Index and Multi-Year Guarantee annuities that show the greatest accumulation values on their corresponding hypothetical illustrations when compared to other insurance industry rates.

B. Kenneth S. Ray is engaged in a non-investment-related business through:

- Insurance commissionable sales for
 - Life insurance
 - Medicare Advantage insurance
 - Index Annuities/ Fixed Annuities
- Notary registration to infrequently notarize client documents as needed

C. Kenneth S Ray is engaged in outside business activities including serving as an adviser to Capstone Legacy Fund, a Christian community foundation and Cornerstone Ministries, a care-giving ministry of the Old Order Amish Church.

Additional Compensation

An investment advisor and its IA Reps must disclose economic benefits received by non-clients for the provision of advisory services. There are no additional compensation arrangements to disclose for this IA Rep.

Supervision

Kenneth S. Ray is self-supervised for compliance related activities. He serves as Chief Compliance Officer for Global Steward Advisors, LLC and reviews policies and procedures on a regular basis. All trades are reviewed by principals of the company before the trades are executed.

Karen M. Weigle

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**Form ADV Part 2B
Brochure Supplement
October 23, 2020**

This Brochure Supplement provides information about Karen M. Weigle that supplements the Global Steward Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Kenneth S Ray, CCO if you did not receive Global Steward Advisors, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Karen M. Weigle is available on the SEC's website at www.adviserinfo.sec.gov.

Education Background and Business Experience

Karen M. Weigle was born in 1976. She graduated magna cum laude from the University of Pittsburgh in 1999 with a Bachelor of Science degree and from Immaculata University in 2003 with a Master of Arts degree. She is licensed in the financial industry; insurance Life and Fixed Annuities, Accident and Health, 2016, and as an Investment Advisor Representative, January, 2018.

Karen serves as portfolio manager for the Global Growth ETF managed accounts.

Ms. Weigle does not have any relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Item 7 A. Ms. Weigle has never been involved in any activity resulting in an arbitration claim alleging damages of any amount or in excess of \$2,500 for an investment or an investment related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, extortion or dishonest, unfair or unethical practices.

Item 7 B. Ms. Weigle has never been subject to any bankruptcy proceeding.

Disciplinary Information

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. Karen M. Weigle does not have any disclosure items.

Other Business Activities

A. Karen M. Weigle utilizes a marketing brand known as Safe IRA, web site www.globalstewardadvisors.com, to identify currently available fixed annuity products as well as other financial information. Safe IRA research seeks to identify current offerings of Fixed Equity Index and Multi-Year Guarantee annuities showing the greatest accumulation values on their corresponding hypothetical illustrations when compared to other insurance industry rates.

B. Karen M. Weigle is engaged in a non-investment-related business through:

- Insurance commissionable sales for
 - Life insurance
 - Index Annuities/ Fixed Annuities

Additional Compensation

An investment advisor and its IA Representatives must disclose economic benefits received by nonclients for the provision of advisory services. There are no additional compensation arrangements to disclose for this IA Representative.

Supervision

Karen M. Weigle is supervised for by Kenneth S. Ray, CCO of Global Steward Advisors, LLC for compliance related activities. Ms. Weigle has reviewed and agreed to comply with EPG's Code of Ethics, Privacy Policy and Policies and Procedures.