Item 1: Cover Page

Gasaway Investment Advisors, Inc.
Form ADV Part 2A
Investment Adviser
Brochure

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June 2026

This Brochure provides information about the qualifications and business practices of Gasaway Investment Advisors, Inc. ("we," "us," "our"). If you have any questions about the contents of this Brochure, please contact Stephanie Lehmkuhl, Chief Compliance Officer, at (269) 324-0080 or info@gasawayinvestments.com.

Additional information about our Firm is also available at www.adviserinfo.sec.gov. 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.

We are a registered investment adviser. Please note that use of the term "registered investment advisor" and a description of the Firm and/or our employees as "registered" does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Summary Of Material Changes

In this Item of Gasaway Investment Advisors, Inc.'s ("Gasaway" or the "Firm," "we," "us," "ours") Form ADV 2, we are required to discuss any material changes that have been made to Form ADV since the last Annual Amendment.

Material Changes since the Last Update

Since the filing of our Annual Amendment on March 25, 2025, we have the following material changes to report:

- Stephanie Lehmkuhl has been appointed Chief Compliance Officer.

Full Brochure Available

Our Form ADV may be requested at any time, without charge by contacting the Firm at (269) 324-0080 or info@gasawayinvestments.com. Additional information about the Firm is also available via the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any employees affiliated with the Firm who are registered as investment adviser representatives.

Item 3: Table of Contents

Item 4: Advisory Business

Firm Information
This Disclosure Brochure ("Form ADV Part 2") provides information regarding the qualifications, business practices, and the advisory services provided by Gasaway Investment Advisors, Inc. (Gasaway or Acronym or "the Firm", "we", "us", "ours").

We are a federally Registered Investment Adviser with the U.S. Securities and Exchange Commission ("SEC"). We were founded in 1990 and are owned and operated by Jim Gasaway.

While we have been providing Third Party Administration and Recordkeeping services for small business retirement plans since 1997, we have recently established a DBA, Alliance Retirement Plan Solutions ("Alliance") which is the name under which we will provide these services through outside advisors going forward.

We provide investment advisory services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, and estates, and corporations or other businesses not listed above. Our investment advisory services include investment management, financial planning, and Third-Party Administration / Recordkeeping services for qualified retirement plans.

Types of Advisory Services
Investment Management
We provide Investment Supervisory Services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. We generally manage advisory accounts on a discretionary basis, but we do allow for both non-discretionary accounts and for non-discretionary investments to be held in discretionary accounts. (An example of a non-discretionary investment held in a discretionary account would be an individual stock that the client has either asked us to purchase or has transferred into the account.)

For individual clients, we generally invest in (but are not limited to) exchange traded funds "ETFs," mutual funds, certificates of deposit, and individual US Treasuries. A mix of all of these investments is generally used in accounts over $50,000 in size while mutual funds are generally used for smaller accounts under $50,000.

Our investment philosophy is to use investments that meet our screening criteria and invest for the long-term. We are independent of any fund, brokerage, or other investment company. Since we have no proprietary products to push or fund family minimums to meet, we can offer unbiased investment recommendations to meet your investment objectives.

We screen the investments, looking for seasoned investment managers managing funds that meet our screening criteria. Then, we monitor the investments to make sure that they continue to perform well relative to their peers, replacing them when we believe it is necessary.

We believe that active investment strategies, which change in response to market conditions, can provide for better long-term returns. Through this active investment strategy, we seek to reduce risk through diversification among different investment categories, but also by seeking to reduce the drag of weaker performers by selling them in a timely fashion. There are risks involved in this, as described later in Item 8.

We manage most accounts through the use of assigning them to a target allocation and then managing the underlying investments and the overall asset allocations.

Financial Planning
We create financial plans for retirement plan participants, individual clients, and prospects. These projections are to help clients determine how much they need to save for retirement and how much they might be able to take in distributions throughout retirement. We can also calculate life insurance needs, education savings needs, etc. if requested by the client.

Services for 401(k) Plans
Gasaway provides retirement plan services through its Alliance Retirement Plan Solutions (Alliance) division. Alliance, is a DBA wholly owned by Gasaway to assist businesses in helping their employees save for retirement by providing bundled and unbundled 401(k) Third Party Administration and Recordkeeping services.

Alliance provides both bundled services to clients of Gasaway as well as bundled and unbundled services to clients of outside advisors. In the instances of Alliance providing bundled services to clients of outside advisors, Gasaway's advisory services are generally limited to investment menu / fund selection and monitoring, as well as model portfolio creation and monitoring (as described below) while Alliance is providing Third Party Administration and, in many instances, Recordkeeping services to the plans.

In plans where Gasaway provides (bundled) investment advisory services to employer-sponsored retirement plans ("Plans") and plan participants ("Participants"), Gasaway will provide either (i) fiduciary investment advice to the Plan to assist the Plan in developing a menu of investment options as a 3(21) investment adviser or (ii) investment management services to the Plan to select, monitor, and adjust the menu of investment options for the Plan as a 3(38) investment manager, each of these terms as defined under the Employee Retirement Income Security Act of 1976 ("ERISA"). For plans using an outside advisor, if the Plan elects to have Gasaway act as a fiduciary to the Plan pursuant to 3(38) of ERISA ("3(38) Fiduciary"), Gasaway will also provide investment advisory services to Participants limited to creating, monitoring, and updating (as it deems necessary) Model Portfolios using the investments available in the menu of investment options outlined above. For Participants who do not make an investment election, Gasaway will automatically default the Participant into a Model Portfolio based upon their age and move them from model to model as they reach various ages as determined by Gasaway.

In addition to the above services, if Gasaway is the sole advisor on the plan, Gasaway will provide additional services, such as employee enrollment meetings, employee update meetings and financial planning services to Participants. These services may be provided in-person or via electronic method, depending on the proximity of the company to Gasaway and the communication methods decided upon by mutual agreement of the plan sponsor and Gasaway. Alliance, when providing Recordkeeping services, provides a digital platform that enables small and medium sized businesses to offer defined contribution retirement plans, such as 401(k) plans and 403(b) plans, to their employees. When Alliance is providing Recordkeeping services, the Plan and its Participants agree to use the online platform to provide information electronically (by the Plan Sponsor, e.g., set-up, onboarding, payroll uploads, and other recordkeeping/administration information as necessary to run the plan) and about themselves (Participants) via the online digital platform provided.

Plans

Gasaway will work with each Plan to develop the menu of investment options for the Plan. If a Plan elects to have Gasaway act as an investment adviser under 3(21) of ERISA ("3(21) Fiduciary"), Gasaway will assist in the screening and monitoring of the investment options as requested by the Plan Sponsor. The Plan Sponsor will then make the final decisions on the selection or replacement of investment options since Gasaway would not have the discretion to change the Plan's investment menu when acting as a 3(21) Fiduciary. The Plan would retain all authority and responsibility to select the available Investment Vehicles.

If a Plan elects to have Gasaway act as a fiduciary to the Plan pursuant to 3(38) of ERISA ("3(38) Fiduciary"), Gasaway would develop the menu of investment options to be provided to the Plan and therefore Participants. Gasaway would have the discretionary authority to change the menu of investment options and would monitor such options on a regular basis. Gasaway would then develop and monitor the Model Portfolios, using the investment options available to participants from the plan's menu of investment options. The investment menu developed by Gasaway typically includes approximately 20-25 mutual funds, though the number of options could increase or decrease over time. Participants would then be able to select their asset allocations on their own, utilizing the plan's menu of investment options, by selecting from the available Model Portfolios, or use the Default Allocation.

Participants

Participants receive discretionary investment advisory services through investments in Model Portfolios, unless they choose to allocate their investments themselves. Participants can: (1) accept Gasaway's recommended Model Portfolio based on information provided by the Plan and Participant, e.g., current age, and assumptions Gasaway makes regarding a Participant's financial circumstances and preferred risk level; (2) complete or update such information, in which case Gasaway could recommend a different Model Portfolio that the Participant can accept; (3) choose a Model Portfolio by indicating their risk tolerance; or (4) choose their own investment allocation (using the menu of investment options for the plan). Not selecting a different option will result in a Participant receiving the Model Portfolio selected by Gasaway, i.e., the Default Allocation (discussed below).

For the Model Portfolios, Gasaway will review the portfolio allocations on a regular basis and determine whether to make changes to such portfolios and/or rebalance Participant's account to be aligned with the applicable Model Portfolio. Additionally, for Models based only on the Participant's age, or where the Participant did not affirmatively elect an investment option, Participants' accounts will be opted into a "glide path," which will result in the Participant's Model Portfolio being adjusted to another Model Portfolio, with the goal of gradually reducing the expected risk of the Participant's account as the Participant ages. Gasaway will then rebalance the account based on the replacement Model Portfolio, in Gasaway's discretion. In reducing the risk of a Participant's account, investment returns can also be reduced. The glide path is based on age bands selected by Gasaway and may be adjusted as Gasaway deems appropriate. Other than through this feature, Gasaway will not automatically review your account to determine whether a Model Portfolio continues to be appropriate for you or assess if another Model Portfolio would be better. However, depending on whether or not an outside advisor is working with the plan and is providing such services, a participant could ask Gasaway for a recommendation on what portfolio Gasaway deems as appropriate at that point in time. Gasaway will not continue to monitor that Participant's portfolio to recommend further changes unless specifically requested to at another point in time. Ongoing monitoring of an appropriate allocation will not be provided by Gasaway.

Participants are not required to accept any Model Portfolio that Gasaway recommends and can choose their own investments by selecting from among the available investments in a Plan's investment menu.

Each Plan has designated Gasaway to provide investment advisory services as the "qualified default investment alternative" ("QDIA") for the Plan. Thus, if a Participant has not selected a Model Portfolio or selected their own asset allocation using the menu of investment options, Gasaway will manage such Participant's account in accordance with a default Model Portfolio that Gasaway selects for a Participant based on the Participant's current age ("Default Allocation"). The Adviser has the discretion to rebalance the Participant's account to the Default Allocation as described above.

<u>Tailored Relationships</u>

Investment Management Services

We tailor investment advisory services to the individual needs of the client. Our clients are allowed to impose restrictions on the investments in their account. All limitations and restrictions placed on accounts must be presented to us in writing.

Plans

If a Plan selects Gasaway to serve as a 3(38) fiduciary, Gasaway selects the Plan's menu of investment options and designs the Model Portfolios based on Gasaway's own due diligence on each Investment Option. Plans that select the Gasaway's 3(38) fiduciary services cannot impose investment restrictions and Plans that would like to impose restrictions (e.g., remove an Investment Option) can do so by selecting the Adviser's 3(21) fiduciary service.

Participants

As described above, Participants that use the platform receive a Model Portfolio recommendation that is based on information that Gasaway has received, e.g., current age, and assumptions that Gasaway makes regarding a Participant's financial circumstances and preferred risk level, and the Participant can make adjustments to the information they provide to receive an updated Model Portfolio Recommendation. However, Participants do not have to accept these recommendations. Instead, a Participant could choose any Model Portfolio by indicating their preferred Model or, if a Participant prefers to select their own asset allocation from the menu of investment options, they could choose from such options.

Participants that do not elect an alternative investment allocation will receive a Model Portfolio based on their current age, also referred to as a Default Allocation, as described above. In providing these recommendations and Default Allocations, Gasaway does not consider other assets held by the Participants or diversification of Participants' entire portfolio of investments, unless specifically requested to do so by the Participant with additional information provided by the Participant.

Wrap Fee Programs

A "wrap-fee" program is one that provides the client with advisory and brokerage execution services for an all-inclusive fee. The client is not charged separate fees for the respective components of the total service. We do not sponsor, manage, or participate in a Wrap Fee Program.

Fiduciary Statement

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act, ("ERISA") and/or the Internal Revenue Code, ("IRC"), as applicable, which are laws governing retirement accounts.

We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must take into consideration each client's objectives and act in the best interests of the client. We are prohibited from engaging in any activity that is in conflict with the interests of the client. We have the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances, and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have a reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;

- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Regulations prohibit us from:

- Employing any device, scheme, or artifice to defraud a client;
- Making any untrue statement of a material fact to a client or omitting to state a material fact when communicating with a client;
- Engaging in any act, practice, or course of business which operates or would operate as fraud or deceit upon a client; or
- Engaging in any manipulative act or practice with a client.

We will act with competence, dignity, integrity, and in an ethical manner, when working with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

Assets Under Management

As of December 31, 2025, we managed $173,113,302 in client assets; $172,416,179 are managed on a discretionary basis and $697,123 on a non-discretionary basis.

Item 5: Fees and Compensation

We base our fees on hourly charges, fixed fees, subscription fees and a percentage of assets under management, which are described below.

Compensation – Investment Management

We do not receive any commissions for the investments that we manage for clients. Instead, we charge investment advisory services on a quarterly basis, in arrears, billed directly to the client's account(s). Fees are calculated and charged on the first business day of the month based on the average daily balance of the previous month for clients being billed on such billing cycle. (See "Client Billing Cycle" below.) For purposes of calculating the fees, accounts for the same client are grouped, then total asset values (less any amounts deemed to be "non-billable") are multiplied by the rates in the client's fee schedule. This amount is then divided by 365 and then multiplied by the number of days in the quarter (or since such account was established if during the quarter.) See "Sample Calculation" below for an example of how the fees are calculated and charged.

Following is our individual annualized fee schedule, which may be negotiated in certain circumstances:

Total Assets Under Management	Annual Fee
Accounts under $50,000*	1.75%
First $500,000 in aggregated assets	1.50%
Next $500,000 in aggregated assets	1.25%
Over $1,000,000 in aggregated assets	1.00%

*This rate is only for clients who have an aggregated balance in advisory accounts below $50,000.

The Investment Management Fees described above include all fees and charges for our investment advisory services. Investment Management Fees do not include administration charges for Third Party Administration/Recordkeeping of retirement plans which shall be contracted for under a separate agreement.

Other Fees and Costs: In addition to our advisory fee, you will also be responsible for custodian fees, account maintenance fees, fees related to mutual funds, and other transactional fees. (see "Compensation – Retirement Plans" below)

Client Billing Cycle

Last name (Plan name) starts with: (and any other clients grouped for billing purposes)	Billing Month (Based on average daily balance)
A-F	February, May, August, November
G-O	March, June, September, December
P-Z	January, April, July, October

Note: Billing may be done on a different cycle, if agreed upon by both parties.

Sample Calculation
A client has three accounts, all of which have been managed by GIA since prior to March 31, 2022, with the following assets as of December 31, 2024:

Trust account	$1,000,000
IRA	200,000
Individual account	25,000
	$1,225,000

The client's fee for the quarter would be calculated as follows:

Assets Under Management	Rate	Fee
First $500,000 in aggregated assets	1.50%	$7,500
Next $500,000 in aggregated assets	1.25%	$6,250
Next $225,000 in aggregated assets	1.00%	$2,250
Total Annualized Fee		$16,000
Daily Fee (divided by 365)	(Rounded for illustration only)	$43.84
Fee for Quarter (multiplied by 90 days in Qtr.)		$3,945
This fee is then charged to each account on a pro-rata basis.		

Non-Discretionary Accounts: Either the above asset-based fee or an hourly fee of $250 per hour.

<u>Compensation</u> – <u>Financial Planning / Consulting</u>
Financial planning and consulting services may be charged in arrears at an hourly rate ranging up to $250 or a subscription rate ranging from $25 to $300 charged monthly in advance.

<u>Calculation and Payment</u>
The specific manner in which we charge fees is established in a client's written agreement with us. Clients may elect to be invoiced directly for fees or to authorize us to directly debit fees

from client accounts.

Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

In no case will more than $1,200 be collected from the client more than 6 months in advance.

Agreement Terms
Either party may terminate an agreement at any time by notifying the other in writing. If the client made an advance payment, we would refund any unearned portion of the advance payment.

If the client made a payment in arrears, we would collect any earned yet unpaid fees.

Cash Balances
Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

Retirement Plan Rollover Recommendations
As part of our investment advisory services to our clients, we may recommend that clients roll assets from their employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a Traditional IRA, or Roth IRA, collectively, an "IRA Account" that we will advise on the client's behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts.

If the client elects to roll the assets to an IRA that is subject to our advisement, we will charge the client an asset-based fee as set forth in the advisory agreement the client executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to the client (i.e., receipt of additional fee-based compensation). Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, clients are under no obligation to have the assets in an IRA advised on by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in our clients' best interests and not put our interests ahead of our clients.'

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of our clients' when making recommendations
- (give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in our clients' best interests;
- charge no more than a reasonable fee for our services; and
- give clients basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

1. leaving the funds in the employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. rolling the funds into an IRA rollover account;
4. cashing out and taking a taxable distribution from the plan.

Each of these options has advantages and disadvantages. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide clients with an explanation of the advantages and disadvantages of both account types and document the basis for our belief that the rollover transaction we recommend is in your best interests.

General Information on Compensation

Our fees may be negotiable based on various criteria, including the services to be provided, the amount of assets that a client invests with us and any pre-existing relationship that we have with the client. Fees will ultimately be based on the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Compensation - Retirement Plans

We offer design, implementation and administration of qualified retirement plans tailored to the needs of the business. These services are for 401(k)s and Profit-Sharing Plans with Third Party Administration and Recordkeeping services provided by Alliance Retirement Plan Solutions.

There are no commissions charged as contributions are made to the plan. Instead, Registered Investment Advisory fees are charged to the plan, and thus to participants accounts. The following is a list of the fees charged to the plan and its participants.

Investment Advisory fees are quoted and charged on a monthly basis, based on the average value for the prior month times the rate. The amount is not adjusted for the number of days in the particular month. The annualized rate is calculated by taking the monthly rate and multiplying by 12. It is not actually used in any calculation of the fees.

For TPA Only services, this pricing is based on receiving compiled electronic files from the Recordkeeper. If the plan has multiple companies involved in the plan (e.g. a MEP Plan), such files must provide a breakdown or a way to breakdown the files by company.

Hourly Fee for Non-Standard Services - This fee is for Non-Standard services such as, but not limited to:

- Error Correction (errors not made by Alliance RPS), including re-processing of plans
- Additional testing or revisions due to plan sponsor changes (non ARPS errors)
- Manual Census Data Collection and/or Reconciliation (Testing & Form 5500)
- Calculation of missed earnings due to Self-Corrections or late deposits

Advisor Advantage, Bundled and Comprehensive

Monthly Administrative Expenses Charged To Company	
Base Fee	$ 150
Per Participant Fee*	$ 8

* Fee can now be charged to participant's account

One Time Charge To Company	
Plan Document Fee:	$ 1,500

Additional Fees	
Hourly Fee for Non-Standard Services	$ 250 /Hr

Administrative Expenses Charged To Participant	
QDRO Processing Fee:	$ 150
Loan Set-Up Fee*	$ 100
Ongoing Loan Fee:	$ 15 /Qtr
Distribution Fee:	$ 100
Paper Statement Fee:	$ 2.50 /Qtr

The following are the investment advisory fees charged to the plans:

Investment Expenses Charged to the Plan

Advisor Advantage

	Average Participant Balance Basis Points per Month				Average Participant Balance Annualized Equivalent			
Expressed in bp per month	<$25,000	$25,000-$50,000	$50,000-$100,000	$100,000 +	<$25,000	$25,000-$50,000	$50,000-$100,000	$100,000 +
<$500,000	11	10	10	9	1.32%	1.20%	1.20%	1.08%
$500,000 - $1 Million	10	9	8	7	1.20%	1.08%	0.96%	0.84%
$1 Million - $3 Million	8	7	6	6	0.96%	0.84%	0.72%	0.72%
$3 Million - $6 Million	6	5	4	4	0.72%	0.60%	0.48%	0.48%
$6 Million - $10 Million	5	4	3	3	0.60%	0.48%	0.36%	0.36%
$10 Million - $15 Million	5	3	3	3	0.60%	0.36%	0.36%	0.36%
$15 Million - $20 Million	4	3	2	2	0.48%	0.36%	0.24%	0.24%
$20 Million - $25 Million	4	2	2	2	0.48%	0.24%	0.24%	0.24%
$25 Million +	4	2	2	2	0.48%	0.24%	0.24%	0.24%

Bundled

	Average Participant Balance Basis Points per Month				Average Participant Balance Annualized Equivalent			
Expressed in bp per month	<$25,000	$25,000-$50,000	$50,000-$100,000	$100,000 +	<$25,000	$25,000-$50,000	$50,000-$100,000	$100,000 +
<$500,000	12	12	11	11	1.44%	1.44%	1.32%	1.32%
$500,000 - $1 Million	11	10	9	8	1.32%	1.20%	1.08%	0.96%
$1 Million - $3 Million	10	8	7	7	1.20%	0.96%	0.84%	0.84%
$3 Million - $6 Million	8	6	6	5	0.96%	0.72%	0.72%	0.60%
$6 Million - $10 Million	7	5	5	4	0.84%	0.60%	0.60%	0.48%
$10 Million - $15 Million	6	4	4	4	0.72%	0.48%	0.48%	0.48%
$15 Million - $20 Million	6	3	3	3	0.72%	0.36%	0.36%	0.36%
$20 Million - $25 Million	5	3	3	3	0.60%	0.36%	0.36%	0.36%
$25 Million +	5	3	3	2	0.60%	0.36%	0.36%	0.24%

Comprehensive

	Average Participant Balance Basis Points per Month				Average Participant Balance Annualized Equivalent			
Expressed in bp per month	<$25,000	$25,000-$50,000	$50,000-$100,000	$100,000 +	<$25,000	$25,000-$50,000	$50,000-$100,000	$100,000 +
<$500,000	16	16	16	16	1.92%	1.92%	1.92%	1.92%
$500,000 - $1 Million	15	13	12	11	1.80%	1.56%	1.44%	1.32%
$1 Million - $3 Million	14	11	10	9	1.68%	1.32%	1.20%	1.08%
$3 Million - $6 Million	12	9	8	7	1.44%	1.08%	0.96%	0.84%
$6 Million - $10 Million	10	7	7	6	1.20%	0.84%	0.84%	0.72%
$10 Million - $15 Million	9	6	5	5	1.08%	0.72%	0.60%	0.60%
$15 Million - $20 Million	9	5	4	4	1.08%	0.60%	0.48%	0.48%
$20 Million - $25 Million	9	4	4	4	1.08%	0.48%	0.48%	0.48%
$25 Million +	9	4	3	3	1.08%	0.48%	0.36%	0.36%

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

"Performance-based fees" are fees based on the capital gains or capital appreciation in an account. We do not charge performance-based fees. "Side-by-side management" refers to the practice of managing both accounts that are charged a performance-based fee and accounts that are charged other types of fees, such as asset-based fees and hourly fees. Because we do not charge performance-based fees, we do not engage in side-by-side management.

Item 7: Types of Clients

Types of Clients

We provide investment supervisory services for individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, and corporations.

Account Minimums

While we have always wanted to help anyone who needs our services and therefore have never had a minimum investment size, we have found that it is sometimes difficult to manage very small accounts. (For example, if we are allocating 5% of a portfolio to Small Cap investments and you have a $15,000 account, then we would be allocating $750 to Small Cap. If the Small Cap fund(s) that we’re buying has a $1,000 minimum, we would not automatically be allocating any of your money to the Small Cap fund.) For individual accounts under $10,000, we often use “Asset Allocation” Mutual Funds, with the fund family determining and making changes to the asset allocations as they deem appropriate.

If you are a participant in a 401(k) where the plan has met the fund minimum, then this would not apply to you as your assets would be combined with the other participants in your plan to meet the fund’s minimum investment.

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

Methods of Analysis

In managing client accounts, we have three main areas where we do analysis.

First, we monitor the various sectors (or broad categories) of the market and determine how much to invest in each sector of the market and then overweight and underweight the various sectors based on what we see. For example, we determine how much to invest in large U.S. companies versus small U.S. companies versus in large foreign companies.

Second, we screen and monitor the individual investments to make sure that the investments we purchase and hold for you are highly rated among their peers. For example, we want to make sure that for the portion of your account that we are investing in small company stocks, that we are purchasing investments that are good relative to other small company funds.

Third, we monitor the market to determine if we should be stepping out of the equities, holding or (if we're not fully invested) stepping back into equities.

Investment Strategies

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.

Other strategies may include long-term purchases, short-term purchases, and trading.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risks of loss:

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties (i.e., Non-traded REITs and other alternative investments) are not.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **Custodial Risk:** This risk is the probability that a party to a transaction will be unable or unwilling to fulfill its contractual obligations either due to technological errors, control failures, malfeasance, or potential regulatory liabilities.

Item 9: Disciplinary Information

We are required to disclose all pertinent facts regarding any legal, regulatory, or disciplinary events that would be material to your evaluation of the Firm or the integrity of our management.

There have never been any legal, regulatory, or disciplinary actions against the Firm or our management persons.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

We are not registered as a broker-dealer, and none of our management persons are registered representatives of a broker-dealer. We are not registered and do not have an application pending as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Insurance Company or Agency

Our firm is not only registered as an investment advisor but also operates as an insurance agency. This dual registration allows us to offer a comprehensive range of financial services to our clients, including investment advisory services and insurance products.

As an insurance agency, certain of our Investment Adviser Representatives who are licensed as insurance agents, may recommend insurance products to our clients. These recommendations are based on our assessment of the client's financial needs and objectives. It is important to note that the purchase of insurance products may result in additional compensation for our firm and its representatives. This compensation may create a conflict of interest, as there is a financial incentive to recommend insurance products.

To mitigate potential conflicts of interest, our firm adheres to strict policies and procedures. We prioritize the best interests of our clients and ensure that all recommendations are made with the client's financial goals in mind. Our representatives are required to disclose any potential conflicts of interest and provide clients with all necessary information to make informed decisions. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from our investment advisory fees.

Third Party Administration

We are in the business of providing Third Party Administration to qualified retirement plans (401k’s, etc.) with which we provide investment advisory services.

Other Investment Advisors

We do not recommend or select other investment advisers to/for our clients. However, we do receive referrals from other financial advisors for retirement plan services, but do not pay for those referrals. This could create a material conflict of interest. This could be a conflict of interest because the other advisors are continuing to provide services to the plans or to participants in the plan. If we were to observe situations where we did not feel the other advisor’s services were adequate for the needs of the client and we were to advise the clients to change their relationship with such advisor, we could lose future referrals from the outside advisor and possibly current clients who were referred by the advisor. We continue to act in a fiduciary manner despite the conflict of interest and will always put the client’s interest first.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Our employees must comply with a Code of Ethics and Statement for Insider Trading (the "Code"). The Code describes our high standard of business conduct, and fiduciary duty to our clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Our employees must acknowledge the terms of the Code at least annually, and any employee not in compliance with the Code may be subject to termination. We will provide a copy of our Code upon request.

Participation or Interest in Client Transactions – Personal Securities Transactions

Both the Firm and our employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code, described above, is designed to assure that the personal securities transactions, activities, and interests of the employees of the Firm will not interfere with (i) making decisions in the best interest of clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. The Firm may maintain a list of restricted securities that employees may not purchase or sell based upon having (or possibly having) access to inside information. Employee trading is continually monitored under the Code and designed to reasonably prevent conflicts of interest between the Firm and our clients.

Participation or Interest in Client Transactions and Principal/Agency Cross Trades

We do not recommend any securities to our clients in which we have a material financial interest. We do not affect any principal or agency cross securities transactions for client accounts. We also do not cross trade between client accounts.

Participation or Interest in Client Transactions – Aggregation

Both the Firm and our employees may invest in the same securities at the same time as the securities we recommend to our clients. Since we are not a market maker for any security, we do not consider this practice to conflict with the interests of our clients.

Neither we, nor our employees aggregate (block) trades with clients.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits
We do not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in "Brokerage – Other Economic Benefits."

Brokerage for Client Referrals
We do not receive client referrals from broker/dealers.

Directed Brokerage
While not routine, the client may direct us to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealers with orders for other accounts managed by us. By directing brokerage, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to our duty of best execution, we may decline a client's request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests us to arrange for the execution of securities brokerage transactions for the client's account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We shall periodically and systematically review our policies and procedures regarding recommending broker-dealers to our client in light of our duty to obtain best execution.

Brokerage - Other Economic Benefits
We may have the opportunity to receive traditional "non-cash benefits" from broker/dealers such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing advisors exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client portfolios; ability to have investment advisory fees deducted directly from client portfolios; access to an electronic communication network for client order entry and portfolio information; access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products.

Broker/dealers may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. We have no written or verbal arrangements whereby we receive soft dollars. While we endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

Trade Aggregation

We may aggregate trades for multiple accounts. Trade aggregation is the act of trading a large block of a security in a single order. Shares of a purchased security are then allocated to the appropriate accounts in the appropriate proportion. The main purposes of order aggregation are (i) for ease of trading and (ii) to obtain a lower transaction cost associated with trading a larger quantity.

Orders for the same security entered on behalf of more than one client may be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on the following considerations: amount of cash in the account, existing asset allocation and industry exposure, risk profile, and type of security. If a partial execution is attained at the end of the trading day, we will generally allocate shares on a pro rata basis but may fill small orders entirely before applying the pro rata allocation. All clients participating in each aggregated order shall receive the average price and subject to minimum ticket charges, pay a pro-rata portion of commissions.

Our allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for us or our employees will not be included in a block trade with client accounts.

Item 13 Review of Accounts

The day-to-day supervision of the accounts, including monitoring changes in market conditions, is the responsibility of our Investment Committee. The Committee is run by Jim Gasaway and is comprised of our “professional level” staff. The Committee generally meets monthly to review current economic activity along with various analysts’ views of the market. (Members of the Committee are monitoring the market between meetings and reserve the right to make changes to accounts as they deem appropriate.) The Committee reviews the discretionary equity and income investments held in client accounts as described in Item 8. We attempt to maintain a risk exposure commensurate with the investment policy. At times, the Committee, based on what it believes current economic and market conditions and risks to be, may reduce client’s equity allocations, which may cause a deviation from the target stock-to-bond allocation range.

Account reviews are accomplished on a regular basis by an associate investment advisor. The associate investment advisor is qualified to do the reviews through both a college education and on the job training. The associate investment advisor is supervised by management.

Review Triggers
Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation (such as retirement, termination of employment, physical move, or inheritance).

Reporting
Each month, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits, and withdrawals, accrued income, dividends, and performance. We may also provide clients with periodic reports regarding their holdings, allocations, and performance.

Notice to Clients
It is impossible to predict the future; there is no assurance that we will attain the client objectives or that any investment recommendations and decisions made will be profitable.

Item 14: Client Referrals and Other Compensation

Other Compensation
We do not receive any economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

Compensation – Client Referrals
Affiliated and Unaffiliated persons or entities, (“Promoters”) may, from time to time refer, solicit, or introduce clients to our Firm. We may compensate certain Promoters consistent with the requirements of the Investment Advisers Act of 1940 as well as applicable state/local laws and regulations. In return, we will agree to compensate the Promoter for the referral. Compensation to the Promoter is dependent on the prospective client entering into an advisory agreement with us for advisory services. Compensation to the Promoter will be an agreed upon percentage of our advisory fee which can be a one-time fee, or recurring, pursuant to a written agreement retained by both our Firm and the Promoter.

Item 15: Custody

Custody – Fee Debiting

Clients may authorize us (in the client agreement) to debit fees directly from their account at the broker dealer, bank, or other qualified custodian ("custodian"). The custodian is advised in writing of the limitation of our access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the Firm. Also, clients may authorize us to debit their TPA/Recordkeeping fees from the bank of the plan sponsor.

Custody – Retirement Plans

When we act as the investment advisory firm, the third-party administrator, and record keeper for a retirement plan client, we have the authority to update distribution amounts **and** change the address of record for those distributions. While this form of custody gives us access to client funds and securities, we have stringent internal controls and procedures over the custody function. In addition, we comply with the SEC's Custody Rule, which requires an annual surprise examination conducted by an independent public accountant.

Custody – Third Party Money Transfers

Clients may provide us with a standing letter of authorization (or similar asset transfer authorization) which allows us to disburse funds on behalf of clients to third parties. We ensure the following conditions are in place when deemed to have custody via third party money movement:

1. The client provides a Written Authorization to the custodian that includes all appropriate information as to how the transfer should be directed;
2. The Written Authorization includes instruction to direct transfers to the third party either on a specified schedule or from time to time;
3. Appropriate verification is performed by the custodian, along with a transfer of funds notice to the client promptly after each transfer;
4. The client may terminate or change the instruction to the custodian;
5. We have no authority or ability to designate or change any information about the third party contained in the instruction;
6. We maintain records showing that the third party is not a related party of the Firm or located at the same address as the Firm; and
7. The custodian sends the client a written initial notice confirming the instruction and an annual written confirmation thereafter.

Custody – Account Statements

Clients receive at least quarterly statements from the custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the reports that we provide. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 Investment Discretion

We may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows us to execute trades on behalf of clients. When such limited powers exist between the Firm and the client, we have the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives.

If we have not been given discretionary authority, we consult with the client prior to each trade.

Item 17: Voting Client Securities

Proxy Voting

We do not have any authority to and do not vote proxies on behalf of clients, nor do we make any express or implied recommendation with respect to voting proxies. Clients retain the sole responsibility for receiving and voting proxies that they receive directly from either their custodian or transfer agents. Clients may contact us for information about proxy voting.

Item 18: Financial Information

We have no financial commitments that impair our ability to meet contractual and fiduciary commitments to clients and we have not been the subject of a bankruptcy proceeding.

We do not require prepayment of fees of both more than $1,200 per client, **and** more than six months in advance; and therefore, we are not required to provide a balance sheet to clients.

Gasaway Investment Advisors, Inc.

Form ADV Part 2B

Investment Advisor Brochure Supplement

7110 Stadium Drive
Kalamazoo MI 49009
Phone: (269) 324-0080
Fax: (269) 324-3834
www.GasawayInvestments.com

James E. Gasaway

June 2026

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Stephanie Lehmkuhl, Chief Compliance Officer, at (269) 324-0080 or info@gasawayinvestments.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

James E. Gasaway Born 1970
CRD #: 2068064

Business Background:
Gasaway Investment Advisors, Inc. 1994 to Present
with retirement plan services through Alliance Retirement Plan Solutions DBA President

Formal Education after High School:
Calvin University
Bachelor of Science in Accounting

Professional Designations:
CERTIFIED FINANCIAL PLANNER™ (CFP®)
Chartered Financial Consultant (ChFC)
Qualified 401(k) Administrator (QKA)
Qualified Pension Administrator (QPA)
Chartered life underwriter (CLU®)
Certified Plan Fiduciary Advisor (CPFA)

Professional Certifications

James E. Gasaway maintains professional designations, which requires the following minimum requirements:

	CERTIFIED FINANCIAL PLANNER™ (CFP®)
Issued By	Certified Financial Planner Board of Standards, Inc.
Prerequisites	Candidate must meet the following requirements: • A bachelor's degree (or higher) from an accredited college or university, and • 3 years of full-time personal financial planning experience
Education Requirements	Candidate must complete a CFP®-board registered program, or hold one of the following: • CPA • ChFC • Chartered Life Underwriter (CLU) • CFA • Ph.D. in business or economics

	• Doctor of Business Administration • Attorney's License
Exam Type	CFP® Certification Examination
Continuing Education Requirements	30 hours every 2 years

Chartered Financial Consultant (ChFC)

Issued By	[The American College of Financial Services]
Prerequisites	Candidate must meet the following requirements: • 3 years of full-time business experience within the five years preceding the awarding of the designation • A high school diploma or equivalent
Education Requirements	6 core and 2 elective courses
Exam Type	Final proctored exam for each course
Continuing Education Requirements	30 hours every 2 years, including one hour of ethics CE

Qualified 401(k) Administrator (QKA)

Issued By	The American Society of Pension Professionals & Actuaries (ASPPA)
Prerequisites	Candidate must meet the following requirements: • A minimum of 2 years' experience in retirement plan related matters is required and Completion of ASPPA's QKA examination series
Education Requirements	Earning ASPPA's QKA credential requires successful completion of the following exams: • Retirement Plan Fundamentals Part 1 (RPF-1) • Retirement Plan Fundamentals Part 2 (RPF-2) • Defined Contribution Administrative Issues – Basic Concepts (DC-1) • Defined Contribution Administrative Issues – Compliance Issues (DC-2)
Exam Type	QKA Certification Examinations
Continuing Education Requirements	40 hours of Continuing Professional Education (CPE) every 2 years

Qualified Pension Administrator (QPA)

Issued By	The American Society of Pension Professionals & Actuaries (ASPPA)
Prerequisites	Candidate must meet the following requirements: • Active QKC credential or have met requirements for QKC
Education Requirements	Earning ASPPA's QPA credential requires successful completion of the following exams • Defined Contribution Administrative Issues – Advanced

	Topics (DC-3) and either • Defined Contribution Administrative Issues – Basic Concepts (DC-1) & Defined Contribution Administrative Issues – Compliance Issues (DC-2) or • QKA1 and QKA2 Exam
Exam Type	ASPPA DB Examination
Continuing Education Requirements	40 hours of Continuing Professional Education (CPE) every 2 years

Chartered Life Underwriter (CLU)

Issued By	The American College of Financial Services
Prerequisites	Candidates must have: • Three Years of full-time business experience within the five years preceding the awarding of the designation
Education Requirements	Four core courses and one elective course or prerequisite designation; combination of live and self-study offerings available
Exam Type	Final closed-book, proctored exam for each course
Continuing Education Requirements	30 hours every 2 years, including one hour of ethics CE

Certified Plan Fiduciary Advisor (CPFA®)

Issued By	National Association of Plan Advisors
Prerequisites	None
Education Requirements	Must pass the Certified Plan Fiduciary Advisor examination
Exam Type	Final certification exam (proctored, closed book)
Continuing Education Requirements	10 hours each year

Item 3: Disciplinary Information

James E. Gasaway has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Outside Business Activities

James E. Gasaway is an adjunct professor at Calvin University for approximately 60 hours a month, for 4 months, at least bi-annually, for which he receives compensation. See response to Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations (You may also check Item 13 – Other Activities of the Forms U4).

James E. Gasaway is also engaged in real estate activity. This activity consists of the ownership of two investment properties, one of which is the office building that he rents to the Firm. See response to Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations (You may also check Item 13 – Other Activities of the Forms U4).

James E. Gasaway is a licensed insurance agent providing long-term care, life, and health insurance policies. In such capacity, he may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that he recommends the purchase of an insurance product, which results in a commission being paid to him as an insurance agent.

Item 5: Additional Compensation

James E. Gasaway does not receive any economic benefit outside of regular salaries or bonuses.

Item 6: Supervision

Stephanie Lehmkuhl, Chief Compliance Officer, supervises the persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Stephanie Lehmkuhl supervises these persons by holding regular staff, investment, and other ad hoc meetings. In addition, Stephanie Lehmkuhl regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Stephanie Lehmkuhl may be reached at (269) 324-0080.

Gasaway Investment Advisors, Inc.

Form ADV Part 2B

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Chase Imberger

June 2026

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Stephanie Lehmkuhl, Chief Compliance Officer, at (269) 324-0080 or info@gasawayinvestments.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

Chase Imberger Born 1998
CRD #: 7289533

Business Background:
Gasaway Investment Advisors, Inc. 2020 to Present
Financial Advisor

Formal Education after High School:
Calvin University
Bachelor of Art in Finance

Professional Designations:
Chartered Financial Consultant (ChFC)
CERTIFIED FINANCIAL PLANNER™ (CFP®)
Chartered Retirement Planning Counselor℠ (CRPC®)
Chartered Retirement Plans Specialist℠ (CRPS®)

Professional Certifications
Chase Imberger maintains professional designations, which requires the following minimum requirements:

Chartered Financial Consultant (ChFC)

Issued By	The American College of Financial Services
Prerequisites	Candidate must meet the following requirements: • 3 years of full-time business experience within the five years preceding the awarding of the designation • A high school diploma or equivalent
Education Requirements	6 core and 2 elective courses
Exam Type	Final proctored exam for each course
Continuing Education Requirements	30 hours every 2 years, including one hour of ethics CE

CERTIFIED FINANCIAL PLANNER™ (CFP®)

Issued By	Certified Financial Planner Board of Standards, Inc.
Prerequisites	Candidate must meet the following requirements:

	• A bachelor's degree (or higher) from an accredited college or university, and • 3 years of full-time personal financial planning experience
Education Requirements	ndidate must complete a CFP®-board registered program, or hold one of the following: • CPA • ChFC • Chartered Life Underwriter (CLU) • CFA • Ph.D. in business or economics • Doctor of Business Administration • Attorney's License
Exam Type	CFP® Certification Examination
Continuing Education Requirements	30 hours every 2 years

Chartered Retirement Planning Counselor℠ (CRPC®)

Issued By	College for Financial Planning
Prerequisites	None
Education Requirements	Candidate must complete the online instructor led or self-study course
Exam Type	Final designation exam (online, timed)
Continuing Education Requirements	16 hours every 2 years

Chartered Retirement Plans Specialist℠ (CRPS®)

Issued By	College for Financial Planning
Prerequisites	None
Education Requirements	Candidate must complete the online instructor led or self-study course
Exam Type	Final designation exam (online, timed)
Continuing Education Requirements	16 hours every 2 years

Item 3: Disciplinary Information

Chase Imberger has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Outside Business Activities

Chase Imberger is a licensed insurance agent providing long-term care, life, and health insurance policies. In such capacity, he may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that he recommends the purchase of insurance products, which results in a commission being paid to him as an insurance agent.

Item 5: Additional Compensation

Chase Imberger does not receive any economic benefit outside of regular salaries or bonuses.

Item 6: Supervision

Stephanie Lehmkuhl, Chief Compliance Officer, supervises the persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Stephanie Lehmkuhl supervises these persons by holding regular staff, investment, and other ad hoc meetings. In addition, Stephanie Lehmkuhl regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Stephanie Lehmkuhl may be reached at (269) 324-0080.

Gasaway Investment Advisors, Inc.

Form ADV Part 2B

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Caitlin Borton

June 2026

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Stephanie Lehmkuhl, Chief Compliance Officer, at (269) 324-0080 or info@gasawayinvestments.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

Caitlin Borton	Born 1985
CRD #: 5377755	
Business Background:	
Gasaway Investment Advisors, Inc.	
with retirement plan services through Alliance Retirement Plan	
Chief Operating Officer	2025 to Present
Solutions DBA Vice President	2023 to 2025
Director of Operations	2020 to 2023
Ameriprise Financial Services, Inc.	2019 to 2020
Operations Manager	
CX Institutional	2018 to 2019
Administrative Associate	
LPL Financial, LLC	2014 to 2019
Administrative Associate	

Formal Education after High School:
Western Michigan University
Bachelor of Arts in Finance

Kalamazoo Valley Community College
Associates of Arts in Business Administration

Professional Designations:
Retirement Income Certified Professional (RICP®)

Professional Certifications

Caitlin Borton maintains a professional designation, which requires the following minimum requirements:

Retirement Income Certified Professional (RICP®)	
Issued By	The American College of Financial Services
Prerequisites	Candidate must meet the following requirements: • 3 years of full-time business experience. The 3-year period

	must be within the 5 years preceding the date of the award. ◦ An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience. ◦ Part-time qualifying business experience is credited toward the three-year requirement on an hourly basis, with 2,000 hours representing the equivalent of one-year full-time experience.
Education Requirements	The RICP program consists of three courses: • Retirement Income Process, Strategies and Solutions; • Sources of Retirement Income; and • Managing the Retirement Income Plan.
Exam Type	Closed-book, proctored final course exams
Continuing Education Requirements	30 hours every two years, including one hour of ethics CE.

Item 3: Disciplinary Information

Caitlin Borton has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Outside Business Activities

Caitlin Borton does not have any outside business activities.

Item 5: Additional Compensation

Caitlin Borton does not receive any economic benefit outside of regular salaries or bonuses.

Item 6: Supervision

Stephanie Lehmkuhl, Chief Compliance Officer, supervises the persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Stephanie Lehmkuhl supervises these persons by holding regular staff, investment, and other ad hoc meetings. In addition, Stephanie Lehmkuhl regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Stephanie Lehmkuhl may be reached at (269) 324-0080.

Gasaway Investment Advisors, Inc.

Form ADV Part 2B

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7110 Stadium Drive
Kalamazoo MI 49009
Phone: (269) 324-0080
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www.GasawayInvestments.com

Ethan Thies

June 2026

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Stephanie Lehmkuhl, Chief Compliance Officer, at (269) 324-0080 or info@gasawayinvestments.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

Ethan Thies	Born 2000
CRD #: 7633759	

Business Background:

Gasaway Investment Advisors, Inc. with retirement plan services through Alliance Retirement Plan Solutions DBA Financial Analyst and Advisor	2022 to Present
American Village Builders Estimating Intern	2020 to 2021

Formal Education after High School:
Kalamazoo Valley Community College
Associate of Arts in Business Administration

Professional Designations:
Chartered Financial Consultant (ChFC)
Certified Investment Management Analyst (CIMA)

Ethan Theis maintains a professional designation, which requires the following minimum requirements:

Chartered Financial Consultant (ChFC)

Issued By	The American College of Financial Services
Prerequisites	Candidate must meet the following requirements: • 3 years of full-time business experience within the five years preceding the awarding of the designation • A high school diploma or equivalent
Education Requirements	6 core and 2 elective courses
Exam Type	Final proctored exam for each course
Continuing Education Requirements	30 hours every 2 years, including one hour of ethics CE

Certified Investment Management Analyst (CIMA)

Issued By	Investment & Wealth Institute

Prerequisites	Candidates must have at least three years of financial services experience and a satisfactory record of ethical conduct, as determined by Investments & Wealth Institute Admissions Committee.
Education Requirements	Executive education course through an approved registered education provider. (Course format varies by provider).
Exam Type	Closed book, proctored final certification exam, online or in person
Continuing Education Requirements	40 hours every 2 years

Item 3: Disciplinary Information

Ethan Thies has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Outside Business Activities

Ethan Thies does not have any outside business activities.

Item 5: Additional Compensation

Ethan Thies does not receive any economic benefit outside of regular salaries or bonuses.

Item 6: Supervision

Stephanie Lehmkuhl, Chief Compliance Officer, supervises the persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Stephanie Lehmkuhl supervises these persons by holding regular staff, investment, and other ad hoc meetings. In addition, Stephanie Lehmkuhl regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Stephanie Lehmkuhl may be reached at (269) 324-0080.

Gasaway Investment Advisors, Inc.

Form ADV Part 2B
Investment Advisor Brochure Supplement

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Peter G. DeKruyter

June 2026

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Item 2: Educational Background and Business Experience

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Peter G. DeKruyter Born 2004
CRD #: 8298783

Business Background:
Gasaway Investment Advisors, Inc. 2026 to Present
Retirement Solutions Advisor

Grand Wealth Management 2025 to 2026
Financial Planning Intern

Formal Education after High School:
Calvin University
Bachelor of Science in Financial Planning

Item 3: Disciplinary Information

Peter G. DeKruyter has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Outside Business Activities

Peter G. DeKruyter does not have any outside business activities.

Item 5: Additional Compensation

Peter G. DeKruyter does not receive any economic benefit outside of regular salaries or bonuses.

Item 6: Supervision

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