



## **Great Wealth Investments**

One Alhambra Plaza  
Floor PH  
Coral Gables, FL 33134

Tel: (347) 375-7100  
Email: [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com)

**April 24, 2025**

### **Form ADV Part 2A Brochure**

Great Wealth Investments is a registered investment adviser. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Great Wealth Investments. If you have any questions about the contents of this brochure, please contact us at (347) 375-7100. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Great Wealth Investments is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our CRD number is 310135.

### Material Changes - Item 2

The purpose of this page is to inform you of any material changes since our previous annual updating amendment filing.

On February 25, 2025, we submitted our annual updating amendment for fiscal year 2024. We have updated Item 4 of our Form ADV Part 2A Brochure to disclose discretionary assets under management of approximately \$10,336,197 and \$525,450 of non- discretionary assets under management.

We also amended Items 5 and 10 of the firm's Form ADV Part 2 Brochure to disclose that Johan Rossi is an insurance agent and that our firm is related to Great Wealth Insurance LLC through common ownership and control.

If you would like to receive a complete copy of our current brochure free of charge at any time, please contact us at (347) 375-7100 or at [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com).

**Table of Contents - Item 3**

**Contents**

Advisory Business - Item 4 .....	4
Fees and Compensation - Item 5 .....	6
Performance-Based Fees and Side-By-Side Management - Item 6 .....	9
Types of Clients - Item 7.....	9
Methods of Analysis, Investment Strategies and Risk of Loss - Item 8.....	9
Disciplinary Information - Item 9 .....	14
Other Financial Industry Activities or Affiliations - Item 10.....	15
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11 .....	16
Brokerage Practices - Item 12 .....	16
Review of Accounts - Item 13 .....	18
Client Referrals and Other Compensation - Item 14 .....	18
Custody - Item 15 .....	18
Investment Discretion - Item 16 .....	19
Voting Client Securities - Item 17 .....	20
Financial Information - Item 18 .....	20
Requirements of State-Registered Advisers - Item 19.....	20
Great Wealth Investments Privacy Notice.....	21
Form ADV Part 2B Brochure Supplement .....	23
Form ADV Part 2B Brochure Supplement .....	26

#### **Advisory Business - Item 4**

##### **Description of Services and Fees**

Pound Cake Holdings LLC DBA Great Wealth Investments (hereinafter "GW Investments") is a Limited Liability Company organized in the State of Florida. The firm was formed in June 2020. Johan Rossi and Antonio Gonzalez are the principal owners of GW Investments. Johan Rossi is the Chief Compliance Officer of our firm.

You may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, and all individuals providing investment advice on behalf of our firm. Such persons are properly registered as investment adviser representatives in applicable jurisdictions where required.

##### **Portfolio Management Services**

Our firm offers discretionary, and in limited cases, non-discretionary portfolio management services to our clients. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you. These decisions would be made based upon your stated investment objectives. You may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Non-discretionary portfolio management service means that we must obtain your approval prior to placing any transactions in your account.

Our investment advice is tailored to meet our clients' needs and investment objectives. If you decide to hire our firm to manage your portfolio, we will meet with you to gather your financial information, determine your goals, and help you decide how much risk you should take in your investments. The information we gather will help us implement an asset allocation strategy that will be specific to your goals.

GW Investments primary uses equities and exchange traded funds in its portfolio management accounts. Additionally, we will provide advice on existing investments you may hold at the inception of the advisory relationship or on other types of investments for which you ask advice. In limited cases, GW Investments may use other types of investments (securities or non-securities, including cryptocurrencies) to help diversify a portfolio when prudent.

We monitor your portfolio's performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions and/or your financial circumstances.

##### **Financial Planning Services**

GW Investments offers various financial planning related services, which assist Clients in the management of their financial resources. Financial planning services are based upon an analysis of the Client's individual needs beginning with one or more information gathering consultations. Once the firm has collected and analysed all documentation gathered during these consultations, GW Investments provides a written financial plan designed to achieve the Client's financial goals and objectives. GW Investments then assists Clients in developing a strategy for the successful management of income, assets, and liabilities. In general, financial planning services may include any one or all of the following:

- Cash Flow Analysis – Assessment of present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, pension plans, employee benefit statements, etc. The firm advises on ways to reduce risk; and, to coordinate and organize records and estate information.
- Retirement Analysis – Identification of long-term financial and personal goals and objectives including advice for accumulating wealth for retirement income or appropriate distribution of assets following retirement. Tax consequences and implications are identified and evaluated.
- Insurance Analysis – Includes risk management associated with advisory recommendations based on a combination of insurance types to meet your needs, e.g., life, health, disability, and long-term care insurance. This will necessitate an analysis of cash needs of the Client's family at death, income needs of surviving dependents, and potential disability income needs.
- Portfolio Analysis/Investment Planning – Presentation of investment alternatives, including asset allocation and its effect on the Client's portfolio; evaluation of economic and tax characteristics of existing investments as well as their suitability for the Client; and, identification and evaluation of tax consequences and their implications.
- Education Savings Analysis – Alternatives and strategies with respect to the complete or partial funding of college or other post-secondary education.
- Estate Analysis – Advising Clients with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques.

The recommendations and solutions are designed to achieve the Client's desired goals, subject to periodic evaluation of the financial plan, which may require revision to meet changing circumstances. Financial plans are based on your financial situation based on the information provided to the firm. We should be notified promptly of any change to your financial situation, goals, objectives, or needs.

Clients can also request financial planning services that cover a specific area, such as retirement or estate planning, asset allocation analysis, manager due diligence, and 401(k) platform due diligence. Clients may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so by engaging us for investment advisory services or by using any advisory, brokerage, or insurance provider you choose.

*Important Note: Information related to tax and legal consequences that is provided as part of the financial plan is for informative purposes only. Clients are instructed to contact their tax or legal advisers for personalized advice.*

#### **Wrap Fee Programs**

We do not sponsor, manage, or participate in any wrap fee programs.

#### **Assets Under Management**

As of February 20, 2025, we have \$10,336,197 in discretionary assets under management and \$525,450 in non-discretionary assets under management.

### Fees and Compensation - Item 5

#### **Portfolio Management Services**

For portfolio management services, GW Investments charges an annual fee based on a percentage of assets under management. The fee is payable monthly, in arrears, and is based on the average daily value of the account. The firm uses the following blended fee schedule:

Assets Under Management	Annual Advisory Fee	Monthly Advisory Fee
First \$2 million	1.75%	0.1458%
Next \$3 million	1.50%	0.1250%
Next \$5 million	1.25%	0.1042%
Over \$10 million	1.00%	0.0833%

#### Sample Fee Calculation

Assume that the fair market value of a portfolio at the end of the billing period is \$8,000,000. In this hypothetical example, our monthly management fee would be assessed as follows:

First \$2,000,000 of account value would be billed at a monthly rate of  $1.75\%/12$  ( $0.1459\%$ ) = \$2,916.00;

Next \$3,000,000 of account value would be billed at a monthly rate of  $1.50\%/12$  ( $0.125\%$ ) = \$3,750.00;

Next \$3,000,000 of account value would be billed at a monthly rate of  $1.25\%/12$  ( $0.1042\%$ ) = \$3,125.00;

The fee for various break points is then added together to determine the total quarterly Account fee:

$\$2,916.00 + \$3,750.00 + \$3,125.00 = \$9,791.00$ .

Fees are negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of the client's financial circumstances, among others. The exact fee payable by the client will be listed in the advisory agreement signed by the client and the firm. The firm offers Associated Persons and their family members a discount of up to 100% of advisory fees.

Generally, the custodian holding the client's account will deduct GW Investments' fees and other transaction and custodial fees directly from a designated account to facilitate billing, provided the client has given written authorization. The qualified custodian will send an account statement on a monthly basis. This statement will detail all account activity.

Our annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses, which will be incurred by the client. However, we will not receive any portion of the commissions, fees, and costs. Please see Item 12 – Brokerage Practices for further information on brokerage and transaction costs.

You may terminate the portfolio management services agreement upon a 30-day written notice to our firm. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

#### **Financial Planning Services Fees**

GW Investments charges a negotiable fixed fee of up to \$10,000.00 for financial planning services. The fee will vary depending on the scope of services offered and the complexity of the client's financial situation. Prior to

engaging GW Investments to provide financial planning services, Clients will be required to enter into a written financial planning agreement. The financial planning agreement will set forth the terms and conditions of the engagement and will describe the scope of the services to be provided. Occasionally, the scope of financial planning services offered may be broader and/or more complex than our customary financial planning service, and the cost may be more than the \$10,000 disclosed in this item. In such cases, we will inform the client of the broadened scope of the plan and will request that the client approve the increased fee in advance of any services rendered. Clients who have obtained a financial plan from our firm will have the ability to engage our firm for an annual financial plan update at a cost of up to \$2,000 per year.

Financial planning fees are payable upon execution of the financial planning agreement. Other fee payment arrangements may be negotiated with the client on a case-by-case basis and all such arrangements will be clearly set forth in the financial planning agreement signed by the client and the firm.

Either party may terminate the financial planning agreement by written notice to the other. In the event the client terminates GW Investments' financial planning services, the balance of any prepaid, unearned fees (if any) will be promptly refunded to the client. GW Investments does not require the prepayment of over \$500, six or more months in advance.

**Important notes regarding billing**

*Billing on Cash Positions:* The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

*Periods of Portfolio Inactivity:* The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

*Negotiability of Fees:* We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

### **IRA Rollover Considerations**

As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account ("IRA") may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase to the investor as a result because the above-described fees will apply to assets rolled over to an IRA and outlined ongoing services will be extended to these assets.

We are fiduciaries under the Investment Advisers Act of 1940 and we have to act in your best interests and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we will invest in mutual funds, exchange traded funds and other international investment company security equivalents ("funds"). The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by these funds (described in each fund's prospectus) to their shareholders. These fees will generally include an advisory fee and other fund expenses.

You will also incur custodial fees, transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the fees or charges imposed by the broker-dealer or custodian. Where suitable, we will recommend no-load mutual funds. To fully understand the total cost you will incur, you should review all the fees charged by the funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

Note: Information related to tax or legal consequences that is provided as part of our overall portfolio management service is for informative purposes only. Clients are instructed to contact their tax professionals or attorneys for tax or legal advice.

### **Sales Compensation**

Certain Associated Persons of GW Investments are licensed insurance agents. As such, Associated Persons can affect transactions in insurance products and earn commission-based compensation for these activities. Clients are instructed that the fees paid to the firm for advisory services are separate and distinct from the commissions earned by our dually licensed Associated Persons.

The sale of annuity contracts or insurance products offered by Associated Persons are intended to complement GW Investments' advisory services. However, the receipt of commission-based compensation presents a conflict of interest because our firm and Associated Persons who are licensed insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than recommendations



made solely based on your needs. GW Investments has policies and procedures in place to monitor all client transactions and all client transaction costs will be disclosed to the client. Clients to whom the firm offers advisory services are informed that they are under no obligation to use the firm's Associated Persons for insurance services and may use the insurance brokerage firm and agent of their choice.

We strive to identify all potential and actual material conflicts of interest between you, our firm, and our Associated Persons in this Disclosure Brochure. If additional conflicts arise in the future, we will notify you in writing and/or provide you an updated Disclosure Brochure.

#### **Performance-Based Fees and Side-By-Side Management - Item 6**

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

#### **Types of Clients - Item 7**

We offer investment advisory services to individuals, high net worth individuals, trusts, estates, corporations, or other business entities.

Generally, we require a minimum of \$1,000,000 to establish an advisory relationship. At our sole discretion we may waive this requirement. We may allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account size. We may allow such aggregation, for example, where we service accounts on behalf of minor children of current clients, individual, and joint accounts for a spouse, and other types of related accounts.

#### **Methods of Analysis, Investment Strategies and Risk of Loss - Item 8**

We may use various methods of analysis to determine an appropriate investment strategy for your portfolio with the goal of reducing risk and increasing performance in each customized portfolio. We seek to recommend investment strategies or products that will give you a diversified portfolio consistent with your investment objective.

##### **Methods of Analysis**

GW Investments uses fundamental analysis, technical analysis, charting and modern portfolio theory in formulating investment advice:

Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, trying to determine a company's or a security's true value by looking at all aspects of the business, including both tangible factors (e.g., machinery buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of determining what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is generally considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value equities, this method of valuation can be used for just about any type of security.

Technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.

Charting analysis involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index, or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends. The primary risk of charting analysis is that it may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Modern Portfolio Theory ("MPT") suggests that investors can limit the volatility in their portfolio, while improving its performance, by spreading the risk among different types of securities that do not always behave the same way. It is a principle of investing that higher potential returns carry higher risk, and conversely, for lower risk, investors must accept lower expected returns. According to MPT, a portfolio (a combination of individual investments) exhibits risk and return characteristics based on its composition and the way those components correlate with each other. For each level of risk, there is an "optimal" asset allocation that is designed to produce the best balance of risk versus return. An optimal portfolio will provide neither the highest returns, nor the lowest risk of all possible portfolio combinations—it will attempt to balance the lowest risk for a given level of return and the greatest return for an acceptable level of risk.

### **Investment Strategy**

Our primary investment strategy is Long Term Purchases. This means that securities are purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

On a limited basis, we may also engage in Short Term Purchases. This means that securities are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

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

The investment advice provided along with the strategies suggested by GW Investments will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

**General Investment Risk:** All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

**Loss of Value:** There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

**Interest Rate Risk:** Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are more sensitive to interest rate changes.

**Credit Risk:** Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower

the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

**Foreign Exchange Risk:** Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

**Risks Associated with Investing in Mutual Funds and Exchange Traded Funds (ETFs):** Mutual funds and ETFs are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

**Cryptocurrency Risk:** Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency", "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the

cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

**Cryptocurrency Tax Risk:** Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

**Cybersecurity Risks:** GW Investments and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established business continuity plans, incident response plans and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks also are present for issuers of securities in which we invest, which could result in material adverse consequences for such issuers and may cause a client's investment in such securities to lose value.

**Concentrated Position Risk:** Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

**Preferred Securities Risk:** Preferred Securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in

issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the issuer's after-tax profits, while bond interest is paid before taxes.

**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. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

**Recommendation of Other Advisers:** In the event we recommend a third-party investment adviser to manage all or a portion of your assets, we will advise you on how to allocate your assets among various classes of securities or third-party investment managers, programs, or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the third-party investment advisers and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a third-party investment adviser. The primary risks associated with investing with a third party is that while a particular third party may have demonstrated a certain level of success in the past; it may not be able to replicate that success in future markets. In addition, as we do not control the underlying investments in third party model portfolios, there is also a risk that a third party may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek third parties with proven track records that have demonstrated a consistent level of performance and success over time. A third party's past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account. Please refer to the third-party investment adviser's advisory agreements, Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

#### Disciplinary Information - Item 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of GW Investments' advisory business or of the integrity of its management personnel. We have no reportable history of material legal or disciplinary events to disclose under this item.

**Other Financial Industry Activities or Affiliations - Item 10**

Johan Rossi is the sole owner of J Rossi & Co Consulting LLC, a consulting practice which provides various services to furniture companies. This outside business activity is not expected to create a material conflict of interest because it does not interfere with Mr. Rossi's activities at GW Investments. However, clients should note that Mr. Rossi devotes about 25% of his professional time to this outside business.

Johan Rossi and Antonio Gonzalez, the principal owners of GW Investments, also have an ownership interest in Great Wealth Consultants, LLC, a business consulting firm specializing in assisting clients in the financial technology space. Occasionally, clients of our firm may also obtain consulting services from Great Wealth Consultants, LLC. The receipt of dual compensation creates a material conflict of interest. However, clients of our firm are not required to engage the services of Great Wealth Consultants, LLC and can work with the business consulting firm of their choice.

**Insurance Activities**

Great Wealth Consultants LLC, dba Great Wealth Insurance is GW Investments' affiliated insurance agency and certain Associated Persons of GW Investments are licensed insurance agents. Our dually licensed Associated Persons can affect transactions in insurance products and earn commission-based compensation for these activities. Clients are instructed that the fees paid to the firm for advisory services are separate and distinct from the commissions earned by our dually licensed Associated Persons.

Receipt of commission-based compensation presents a conflict of interest because our firm and persons providing investment advice on behalf of our firm who are licensed insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than recommendations made solely based on your needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is suitable for the client's particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients in illustrating how the insurer also reviews the client's application and disclosures prior to the issuance of a resulting insuring agreement. Ultimately, all insurance sales are on a non-discretionary basis and are offered by duly licensed and supervised insurance professionals by our affiliated entity. Clients are under no obligation contractually or otherwise, to purchase insurance products through any person or entity affiliated with our firm.

Neither GW Investments nor its Associated Persons are registered as, or have pending applications to become a broker-dealer or a representative of a broker-dealer.

Neither GW Investments nor its Associated Persons are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor, or an associated person of the foregoing entities.

GW Investments does not utilize nor select third-party investment advisers.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11**

#### **Description of Our Code of Ethics**

GW Investments has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes GW Investments' policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics;
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of GW Investments' Code of Ethics is available upon request to Johan Rossi, CCO, at (347) 375-7100 or at [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com).

#### **Personal Trading Practices**

At times, GW Investments and/or its Associated Persons may take positions in the same securities as clients. This is considered a conflict of interest with clients. GW Investments and its Associated Persons will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades, however, we will uphold our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (e.g., a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Alternatively, Accounts owned by our firm or Associated Persons of our firm may participate in block trading with client accounts; however, they will not be given preferential treatment. Mutual fund purchases are not subject to these policies because the transactions are executed at NAV at the end of the trading day.

### **Brokerage Practices - Item 12**

GW Investments has an institutional custodial relationship with Interactive Brokers, LLC ("Interactive Brokers") and we will recommend Interactive Brokers as the broker-dealer and custodian of your account. Interactive Brokers is an independent and unaffiliated SEC-registered broker-dealer and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Interactive Brokers offers services, which include custody of securities, trade execution, clearance, and settlement of transactions. Our Associated Persons are not registered representatives of Interactive Brokers; and, they do not receive commissions or other compensation from recommending the brokerage or custodial services offered by Interactive Brokers.



We believe that Interactive Brokers provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Interactive Brokers, including the value of research provided the company's reputation, execution capabilities, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services Interactive Brokers provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We may receive additional benefits from Interactive Brokers such as electronic delivery of client information, electronic trading platforms, institutional trading support, proprietary and/or third-party research, continuing education, practice management advice, and other services provided by custodians for the benefit of investment advisors.

The receipt of additional benefits may give us an incentive to require that you maintain your account with Interactive Brokers based on our interest in receiving Interactive Brokers' services rather than your interest in receiving the best value and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Interactive Brokers as custodian and broker is in the best interests of our clients. Our belief is primarily supported by the scope and quality of services Interactive Brokers provides to our clients and not services that benefit only us. Additionally, these benefits are offered to all investment advisers that use Interactive Brokers for brokerage and execution services and not just our firm.

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers and custodians with which we have an institutional advisory arrangement. We do not receive other benefits from a broker-dealer in exchange for client referrals.

#### **Directed Brokerage**

In very limited circumstances, and at our sole discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. In the event that a client directs GW Investments to use a particular broker-dealer, the firm may not be authorized to negotiate commissions and may not be able to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct the firm to use a particular broker-dealer and those that do not.

#### **Trade Aggregation**

While individual client advice is provided to each account, client trades may be executed as a block trade. We encourage clients to use Interactive Brokers. Typically, only accounts in the custody of Interactive Brokers would have the opportunity to participate in aggregated securities transactions. When appropriate, trades using Interactive Brokers will be aggregated and done in the name GW Investments. The executing broker will be informed that the trades are for the account of GW Investments' clients and not for the firm itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. On average, the aggregation should reduce slightly the costs of execution. GW Investments will not aggregate a client's order if in a particular instance the firm believes that aggregation would cause the client's cost of execution to be increased. Interactive Brokers will be notified of the amount of each trade for each account. GW Investments and/or its Associated Persons may participate in block trades with clients, and may also participate on a pro rata

basis for partial fills, but only after the determination has been made that clients will receive fair and equitable treatment.

### **Review of Accounts - Item 13**

#### **Managed Account Reviews**

GW Investments monitors client's account holdings on a continuous basis, conducts full account reviews on a quarterly basis, and recommends a formal review with the client at least annually. Accounts are reviewed by the Associated Person assigned to the account.

A financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

Additional reviews may be offered in certain circumstances. Triggering factors that may result in additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or a client's request. Clients are encouraged to notify our firm if changes occur in their personal financial situation.

Clients will receive consolidated reports and statements directly from their account custodian(s) on at least a quarterly basis. Additionally, the custodian offers clients electronic account access through its website.

### **Client Referrals and Other Compensation - Item 14**

GW Investments has brokerage and clearing arrangements with Interactive Brokers, and the firm receives additional benefits from this firm. These additional benefits are listed under Item 12 above.

Non-employee (outside) consultants, individuals, and/or entities, who are directly responsible for bringing a client to GW Investments receive compensation from the firm. Such arrangements will comply with the requirements set forth the Investment Advisers Act of 1940 and similar state regulations, including the requirement that the relationship between the promoter and the investment adviser be disclosed to the client at the time of referral. Under these arrangements, the client does not pay higher fees than GW Investments' customary advisory fees.

### **Custody - Item 15**

In cases where GW Investments is given direct fee deduction authority, the firm will be deemed to have custody of client funds and securities. In such cases, concurrent with the deduction of fees, GW Investments will send the client an invoice showing the amount of the fee, the time period covered by the fee, the value of the client's assets on which the fee is based, and the specific manner in which the fee was calculated.

GW Investments is not deemed to have custody of accounts custodied at Interactive Brokers because the advisory fee is calculated and deducted by Interactive Brokers in accordance to the fee calculation and deduction authorization given by the client to Interactive Brokers, and not to GW Investments. Our firm is not involved in the calculation and deduction of these advisory fees.

Clients receive account statements at least quarterly from the broker-dealer or other qualified custodian holding the account. The custodian will not verify the calculation of the advisory fees. You are urged to review custodial account statements for accuracy. If you have questions regarding your account or if you did not receive a statement from your custodian, please contact us at (347) 375-7100 or at [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com).

With respect to third party standing letters of authorization ("SLOA") where a client grants us authority to direct custodians to disburse funds to one or more third party accounts, we are deemed to have custody pursuant to Rule 206(4)-2 (the "Custody Rule"). We have taken steps to have controls and oversight in place to comply with the no-action letter issued by the SEC on February 21, 2017 (the "SEC no-action letter"). We are not required to comply with the surprise examination requirements of the Custody Rule if we comply with the representations noted in the SEC no-action letter. Where our firm acts pursuant to a SLOA, we believe we are making a good faith effort to comply with the representations noted in the SEC no-action letter. Additionally, since many of the representations noted in the SEC no-action letter involve the qualified custodian's operations, we will collaborate closely with our custodian(s) to ensure that the representations are met.

#### **Investment Discretion - Item 16**

GW Investments offers Portfolio Management Services on a discretionary, and in limited cases, on a non-discretionary basis. For discretionary services, clients must grant discretionary authority in the management agreement. Discretionary authority extends to the types and amounts of securities to be bought and sold in client accounts. However, our firm does not retain discretionary authority to select the broker-dealer used for transactions, or commission rates paid. The client provides GW Investments discretionary authority via a limited power of attorney in the management agreement and in the contract between the client and the custodian.

If you wish, you may limit our discretionary authority, for example, by setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you have engaged us for non-discretionary portfolio management services, GW Investments will obtain your approval prior to executing any transactions in your account(s).

#### Voting Client Securities - Item 17

GW Investments does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

#### Financial Information - Item 18

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We have not been the subject of a bankruptcy petition in the last ten years. Additionally, we do not require the prepayment of more than \$500 in fees, six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

#### Requirements of State-Registered Advisers - Item 19

##### **Principal Executive Officers and Management Persons**

Johan Rossi is the sole owner, principal executive officer, and management person of GW Investments. Please see Item 2 below in the attached Form ADV Part 2B brochure supplements for information regarding his educational and business background.

##### **Outside Business Activities**

Please refer to "Item 10 - Financial Industry Activities and Affiliations" of this Form ADV Part 2A disclosure brochure and "Item 4 – Other Business Activities" of the Form ADV Part 2B Brochure Supplement below for information about Mr. Rossi's outside business activities.

##### **Performance-Based Fees**

Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. As disclosed above at Item 6 of this Form ADV Part 2A disclosure brochure, we and our Associated Persons do not accept performance-based fees.

##### **Disciplinary Information**

We have no reportable material legal or disciplinary events to report under this item.

##### **Other Relationships or Arrangements with Issuers of Securities**

GW Investments and its Associated Persons do not have any relationships or arrangements with any issuer of securities.

### **Great Wealth Investments Privacy Notice**

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P") and/or comparable state laws. Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

#### **Information We Collect**

Great Wealth Investments must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

#### **Information We Disclose**

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with applicable federal and/or state laws, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as our attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

*Regulation S-AM:* Under Regulation S-AM, we are prohibited from using eligibility information that we receive from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out.

Great Wealth Consultants LLC, dba Great Wealth Insurance and Great Wealth Investments share eligibility information obtained from clients with each other to make marketing solicitations.

#### **Confidentiality And Security**

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

#### **Accuracy**

We strive to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time; we encourage our clients to provide feedback and updated information to help us meet our goals.

**Contact Us**

If you have any questions about our privacy policies, or if you do not want to allow us and our affiliated insurance firm to share your information with each other to make marketing solicitations, please contact Johan Rossi, CCO, at (347) 375-7100 or at [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com).

## **Johan Rossi**

### **Managing Member/Chief Compliance Officer**

One Alhambra Plaza  
Floor PH  
Coral Gables, FL 33134

Tel: (347) 375-7100

Email: [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com)

February 25, 2025

### **Form ADV Part 2B Brochure Supplement**

This Brochure Supplement provides information about Johan Rossi that supplements the Disclosure Brochure of Great Wealth Investments (hereinafter “GW Investments”), a copy of which you should have received. Please contact Johan Rossi if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Johan Rossi is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Rossi’s individual CRD number is 7042037.

### Educational Background and Business Experience - Item 2

#### **Principal Executive Officers and Management Persons**

**Johan Rossi**

Year of Birth: 1988

#### **Formal Education:**

- Fordham University, Finance, B.A., 2010

#### **Business Background for Previous Five Years:**

- Great Wealth Consultants LLC, dba Great Wealth Insurance LLC, Managing Member, 12/2021 to Present.
- Great Wealth Investments, Managing Member/CCO, 07/2020 to Present.
- J Rossi & Co Consulting LLC, Managing Member, 09/2021 to Present.
- MFV Management, LLC, Partner, 10/2022 to 01/2024.
- MFV Entertainment, LLC, Principal Partner, 10/2022 to 01/2024.
- Tempur Sealy International, Senior Key Account Manager, 03/2012 to 03/2022.
- Planner Securities, LLC, Registered Representative, 04/2020 to 12/2020.
- Gentem Capital LLC, Business Development, 01/2019 to 09/2019.

### Disciplinary Information - Item 3

Mr. Rossi has no reportable material legal or disciplinary events to report under this item.

### Other Business Activities - Item 4

Please refer to Item 10 of our Form ADV Part 2A above for information about Mr. Rossi's other business activities.

### Additional Compensation – Item 5

Apart from compensation received for the activities listed in Item 4 above, Mr. Rossi does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

### Supervision - Item 6

Mr. Rossi is an investment adviser representative of GW Investments. In this role, Mr. Rossi is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Rossi is also the Chief Compliance Officer of GW Investments. In this capacity, Mr. Rossi is responsible for the implementation of the firm's compliance program.



GW Investments has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Rossi adheres to GW Investments' code of ethics and compliance manual as mandated.

Additionally, GW Investments is subject to regulatory oversight by various agencies. These agencies require registration by GW Investments and its employees. As a registered entity, GW Investments is subject to examinations by regulators, which may be announced or unannounced. GW Investments is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

#### **Requirements for State-Registered Advisers - Item 7**

##### **Disciplinary Information**

Mr. Rossi has not been involved in any reportable disciplinary events.

##### **Bankruptcy Petition**

Mr. Rossi has not been subject to a bankruptcy petition.

## **Antonio A. Gonzalez**

**Member/Chief Executive Officer/Investment Adviser Representative**

One Alhambra Plaza  
Floor PH  
Coral Gables, FL 33134

Tel: (347) 375-7100  
Email: [inquiries@greatwealthinvest.com](mailto:inquiries@greatwealthinvest.com)

February 25, 2025

### **Form ADV Part 2B Brochure Supplement**

This Brochure Supplement provides information about Antonio A. Gonzalez that supplements the Disclosure Brochure of Great Wealth Investments (hereinafter "GW Investments"), a copy of which you should have received. Please contact Antonio A. Gonzalez if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Antonio A. Gonzalez is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Gonzalez' individual CRD number is 3023675.

**Educational Background and Business Experience - Item 2**

**Antonio A. Gonzalez**

Year of Birth: 1976

**Formal Education:**

- City University of New York, ABA. Business Administration, 1998

**Business Background for Previous Five Years:**

- Great Wealth Investments, Member/Chief Executive Officer/Investment Adviser Representative, 03/2022 to Present.
- Great Wealth Consultants LLC, dba Great Wealth Insurance, Managing Member, 12/2021 to Present.
- MFV Management, LLC, Principal Partner, 10/2022 to 01/2024.
- MFV Entertainment, LLC, Principal Partner, 10/2022 to 01/2024.
- Apex Clearing Corporation, Sr. Relationship Manager, 08/2012 to 12/2021.

**Disciplinary Information - Item 3**

Mr. Gonzalez has no reportable material legal or disciplinary events to report under this item.

**Other Business Activities - Item 4**

Please refer to Item 10 of our Form ADV Part 2A above for information about Mr. Gonzalez's other business activities.

**Additional Compensation – Item 5**

Apart from compensation received for the activities listed in Item 4 above, Mr. Gonzalez does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

**Supervision - Item 6**

Mr. Gonzalez is an investment adviser representative of GW Investments. In this role, Mr. Gonzalez is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Johan Rossi, Chief Compliance Officer, supervises Mr. Gonzalez and can be reached at the phone number on the cover of this brochure.

GW Investments has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Gonzalez adheres to GW Investments' code of ethics and compliance manual as mandated.

Additionally, GW Investments is subject to regulatory oversight by various agencies. These agencies require registration by GW Investments and its employees. As a registered entity, GW Investments is subject to examinations by regulators, which may be announced or unannounced. GW Investments is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

#### **Requirements for State-Registered Advisers - Item 7**

##### **Disciplinary Information**

Mr. Gonzalez has not been involved in any reportable disciplinary events.

##### **Bankruptcy Petition**

Mr. Gonzalez has not been subject to a bankruptcy petition.