



Golden Retirement Advisors, Inc.
Platform Program
Form ADV Part 2A – Disclosure Brochure
Effective: March 31, 2020

This Disclosure Brochure provides information about the qualifications and business practices of Golden Retirement Advisors, Inc. (“GRA” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (212) 763-3380 (or email us at info@goldenretirement.com).

GRA is a Registered Investment Advisor in the States of New York, New Jersey, and Connecticut. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about GRA to assist you in determining whether to retain the Advisor.

Additional information about GRA and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

Golden Retirement Advisors, Inc.
CRD No: 156780
369 Lexington Avenue, Third Floor
New York, NY 10017
(212) 922-1868
www.goldenretirement.com

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A and Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of GRA.

GRA believes that communication and transparency are the foundation of our business. We continually strive to provide complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome feedback. GRA did not submit renewal in December, 2019 in a timely manner in New York; but did successfully renew by the extension date in January, 2020.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. The Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and whenever a material change occurs in the business practices of GRA.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for GRA:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **156780** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (212) 763-3380.

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Item 4 - Advisory Services

A. Firm Information

Golden Retirement Advisors, Inc. (“GRA” or the “Advisor”) is a Registered Investment Advisor with the States of New York, New Jersey, and Connecticut, and is organized as a corporation under the laws of the State of New York. GRA was founded in 2011 and is a wholly owned subsidiary of Golden Retirement LLC. Jerome S. Golden (President) is the principal owner of Golden Retirement, LLC. GRA offers investment advisory services in the form of retirement planning to both mass affluent and high net worth individuals (each referred to as a “Client”).

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by GRA.

B. Advisory Services Offered

GRA’s core offering is a Plan for Retirement Income (“Plan”), which concentrates on helping clients achieve security in retirement, with the goal of maximizing their dependable, spendable income. The Plan integrates (1) investments in major savings sources, including Rollover IRAs, after-tax personal savings, equity in a primary residence, and fixed and variable deferred annuities, and (2) fixed payout annuities (each, an “FPA”). The Plan may incorporate all of a Client’s retirement savings or a single savings source. GRA uses proprietary software and analytics to conduct retirement income planning with clients. A Client can develop a preliminary Plan by accessing Golden Retirement’s planning tools on its Go2Income website. GRA will provide the Client with one-hour of complimentary consulting to develop or refine a preliminary Plan.

GRA planning is focused on income strategies involving dividends, interest, managed withdrawals from model investment portfolios or other savings sources, and annuity payments. GRA utilizes several basic model portfolios in doing its planning and uses both deterministic and historical assumptions regarding portfolio performance in designing a Plan, the objective of which is to provide cash flow for the lifetime of a Client, with less dependence on future market performance. A Plan will typically recommend the allocation between model portfolios and FPAs for each savings source.

GRA may also consult with the client on the refinement of a preliminary Plan developed online and provide ongoing Plan management, including updates to the Plan.

Selection of Investment Platform, Portfolios and FPAs

If requested by the Client, GRA will recommend an investment platform that provides a selection of portfolios, analytics, low fees, tax management tools, financial stability and operational support required for the Plan.

GRA will also recommend portfolios available on that platform that are consistent with the Plan’s objectives. Client will retain complete discretion regarding all investment decisions. It should be noted that past performance of the recommended portfolios should not be construed as an indication of future results. Investment portfolios will go up or down,

depending on market conditions; and there are no promises, guarantees or warranties that any of the portfolios will generate the performance we have assumed in the preparation of your Plan.

If a client prefers active portfolio management, GRA will work with Clients to help them select an advisor to provide portfolio management, referred to as a Portfolio Management Advisor (PMA). As part of the process of selecting an investment advisor who will handle portfolio management, Clients will receive our ADV disclosure brochure (Portfolio Management Advisor Program) and a brochure from the PMA which will describe, among other things, investment strategies, fees and custodial arrangements.

GRA will not provide securities custody or other administrative services. At no time will GRA accept or maintain custody of a Client's funds or securities.

For FPAs that are part of a Client's Plan, highly rated insurance companies hold and administer the contract on behalf of the Client.

Income Planning and Consulting Services

Development of Preliminary Plan. A Client has access to the Go2Income website tools to develop a preliminary Plan. GRA will support the Client with one-hour of complimentary consulting to develop or refine a preliminary Plan.

Plan Management Services. If elected by the Client, GRA will also provide ongoing services, including (1) monitoring and updating a Plan on an ongoing basis, (2) performance monitoring of the selected model portfolios, and (3) advice regarding the timing and amount of managed withdrawals from model portfolios and the allocation of such withdrawn amounts.

Retirement Income Consulting Services. GRA offers retirement income planning services on a separate hourly basis to individuals who request such services. These services include refinement of a preliminary Plan (after the one-hour of complimentary consulting), and retirement planning advice, such as: (1) tax management strategies related to a Client's Plan, (2) Social Security claiming strategies, and (3) legacy and long-term care planning.

We may also perform additional consulting services related to implemented Plans at Client's request. While these services are not our core business, when we decide, on a case-by-case basis, to accept such an arrangement, the agreed upon fee will vary, depending on the complexity of the Client's needs. GRA may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation.

Income planning and consulting recommendations may pose a potential conflict between the interests of GRA and the interests of the Client. Clients are not obligated to implement any recommendations made by GRA or maintain an ongoing relationship with GRA. If the Client elects to act on any of the recommendations made by GRA, the Client is under no obligation to implement a Plan through GRA.

C. Tailoring Services to Individual Needs of Clients

The planning process described above is tailored to the client as to age, gender, marital status, years to retirement, tolerance for investment risk, and income objectives. Any portfolio recommendations are based on plan objectives as to income, and tolerance for investment risk.

D. Wrap Fee Programs

GRA does not manage or place Client assets into a wrap fee program.

E. Assets Under Management

GRA has under \$1 million of assets under management as of December 31, 2019. These assets are not managed by GRA and are being monitored through a PMA arrangement. Clients may request more current information at any time by contacting GRA.

Item 5 – Fees and Compensation

As explained below, GRA may receive the following compensation: (1) consulting fees for retirement income planning services, and (2) plan management fees. An affiliate of GRA may receive commissions on FPAs included in a Plan. GRA follows procedures designed to assure that such financial products are recommended only when appropriate to fulfill the retirement planning objectives of its Clients.

Either party may terminate its GRA agreement for any reason without penalty upon written notice delivered to the other party. Upon termination, any earned, unpaid fees will be invoiced based upon the time spent and services rendered by GRA up to the time of termination and will be payable within five (5) business days. Any fees paid in advance will be refundable on a prorated basis for work not completed.

See below for a description of when compensation under (1) may be deferred.

A. Fees for Investment Advisory Services

Fees for Retirement Income Consulting

GRA provides one hour of free consultation to develop a customized Plan for Retirement Income. If because of the complexity of the Client situation, GRA expects that completion of a Plan will take longer than one hour, then GRA may charge hourly rate(s) for its services. The terms of the arrangement will cover, among other things, the following: scope of assignment; hourly rate (s), and the estimated total cost.

GRA offers retirement income planning services on a separate hourly basis to individuals who request such services. These services include updates to a Plan and retirement planning advice, such as: (1) tax management strategies for Client's Plan, (2) Social Security claiming strategies, and (3) legacy and long-term care planning. Set out below is the fee schedule.

Retirement Income Consulting Hourly Fee Schedule	
Provider of Service	Hourly Rate
Principal	\$400
Associate	\$200
Assistant	\$75

Fees for Plan Management Services

GRA may also provide ongoing services, including (1) monitoring and updating a Plan on an ongoing basis, (2) performance monitoring of the selected model portfolios, and (3) advice regarding the timing and amount of managed withdrawals from model portfolios and the allocation of such withdrawn amounts.

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Set out below is the fee schedule.

Fees for Plan Management Services	
Total Savings Applied to Plan	Monthly Fee
Under \$500,000	\$50
\$500,000 to \$1,000,000	\$75
Over \$1,000,000	\$100

B. Fee Billing

Fees for Retirement Income Consulting Services

Income planning and consulting fees are due upon completion of services. Fee shall be invoiced by GRA and are due upon receipt by the Client. These fees can be paid at implementation of a Plan or spread (without interest) over the first two (2) years of an implemented Plan if Plan management services (below) are elected. If no Plan is implemented through GRA or its affiliate, fees will be due at termination of the assignment.

Fees for Plan Management Services

For Plan management services involving monitoring and updating of a Plan, monitoring portfolios, and advice regarding the timing, amount and allocation of managed withdrawals from model portfolios, Client shall pay GRA monthly fees according to the Plan Management Services fee schedule above. These fees may be increased during the first two (2) years by any hourly fees for Retirement Income Consulting described above that have been deferred.

Allocation of Fees to Investment Portfolios

No fees will be deducted from Portfolios; all fees will be billed to Client.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than GRA, in connection with investments made on behalf of the Client. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer.

In addition, fees paid for GRA's investment advisory services are separate and distinct from the internal product/fund expenses charged by mutual funds, variable annuities and exchange-traded funds, if applicable. These fees and expenses are described in each product's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee.

D. Advance Payment of Fees and Termination

Upon termination of an assignment to provide Retirement Income Consulting Services, any earned, unpaid fees will be invoiced based upon the time spent and services rendered by GRA up to the time of termination and will be payable within five (5) business days. Any fees paid in advance will be refundable on a prorated basis for work not completed.

E. Compensation for Sales of Securities

GRA does not receive any compensation on the sales or purchase of securities.

Item 6 – Performance-Based Fees

GRA does not charge performance-based fees for its investment advisory services. The fees charged by GRA are as described in Item 5 (Fees and Compensation) above and are not based upon the capital appreciation of the funds or securities held in any underlying account.

GRA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

GRA provides investment advisory services to mass affluent and high net worth private investors.

The relative percentage of each type of Client is available on GRA's Form ADV Part 1. These percentages will change over time. GRA imposes a minimum account size of \$250,000 for a Retirement Planning Agreement to develop a Plan for the Client.

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

A. Methods of Analysis

In designing a Plan, GRA will consider, among other things, tax laws and regulations, current interest rates, historical market returns, together with the Client's objectives and risk tolerance to produce dependable, spendable income.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. GRA will assist Clients in developing a Retirement Income Plan with a lower exposure to riskier investments than traditional planning.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with GRA.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving GRA or any of its employees. GRA and its advisory personnel value the trust Clients place in them. As we advise all Clients, we encourage the Client to perform the requisite due diligence on any advisor or service provider chosen as a service partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **156780** in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

Item 10 – Other Financial Activities and Affiliations

Jerome S. Golden actively participates in the operation of Golden Retirement, LLC, the parent to the Advisor. Golden Retirement, LLC provides educational content and resources on the Go2Income website to aid individuals with retirement planning. Additional details are provided in Item 19 below.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics

GRA has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with GRA. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to each Client. GRA and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of GRA associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include: general ethical principles; reporting personal securities trading; exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations; distribution of the Code of Ethics; review and enforcement processes; amendments to Form ADV and supervisory procedures. GRA has written its Code of Ethics to meet and exceed regulatory standards. GRA will provide a copy of its Code of Ethics to Clients or prospective Clients upon request. To request a copy of our Code of Ethics, please contact us at (212) 763-3380.

B. Personal Trading and Conflicts of Interest

GRA allows our employees to use the same investment platform and portfolios as recommended to our Clients. We do not select the purchase or sale of any particular security on behalf of the Client.

IF our employees were to own the same securities in a portfolio recommended to Clients it would present a potential conflict of interest that, as fiduciaries, we must disclose to the Client and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the

misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to the Client. At no time, will GRA or any associated person of GRA, transact in any security to the detriment of any Client.

Item 12 - Brokerage Practices

A. Recommendation of Custodian[s]

As indicated above we are recommending an investment platform that serves as custodian. Our recommendation was based on the criteria listed above in Section 4.B.

B. Aggregating and Allocating Trades

We do not trade securities on behalf of the client.

Item 13 - Review of Investment Accounts

A. Frequency of Reviews

If Plan Management Services are elected, we will conduct a detailed review of on a quarterly basis, and in periods with considerable volatility.

B. Causes for Reviews

Besides regular quarterly reviews under a Plan Management Services engagement, we will conduct a review whenever requested by the Client and in periods with considerable volatility.

C. Review Reports

The Client will receive an automated quarterly report of Plan results and will be able to meet with an assigned advisor.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by GRA

GRA's primary business is as a retirement planner developing a Plan for Retirement Income. In addition, it may receive consulting fees described in Item 5. An affiliate of GRA may receive commissions on FPAs.

B. Client Referrals from Solicitors

GRA does not engage paid solicitors for Client referrals. GRA in the future may develop other co-advisory, sub-advisory and/or referral fee relationships in order to facilitate delivering desired Client services.

Item 15 - Custody

GRA does not accept or maintain custody of any Client accounts.

Item 16 - Investment Discretion

GRA does not have any investment discretion.

Item 17 - Voting Client Securities

GRA does not review or vote individual securities.

Item 18 - Financial Information

Neither GRA, nor its management has any adverse financial situations that would reasonably impair the ability of GRA to meet all obligations to its Clients. Neither GRA, nor any of its advisory personnel, has been subject to a bankruptcy or financial compromise. GRA is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Item 19 – Requirements for State Registered Advisors

A. Background of Principal Officers (Jerome S. Golden)

The President and Chief Compliance Officer of GRA is Jerome S. Golden. Mr. Golden, born in 1944, is actively involved with the daily operations of GRA and in conducting retirement income planning. Mr. Golden also serves as the President of Golden Retirement, LLC, the parent firm of the Advisor.

As President of Golden Retirement, LLC, Mr. Golden manages the development of retirement solutions and planning services offered directly to retail investors through a combination of online and offline channels.

Prior to founding Golden Retirement, LLC, Mr. Golden was President of the Income Management Strategies Division of MassMutual Financial Group, where he and his team developed the Retirement Management Account (RMA), a patent-pending managed account platform that converts retirement savings into retirement income. Initially conceived at his firm Golden Retirement Resources (acquired by MassMutual in 2005), RMA has been described by Cerulli Associates as the quintessential managed account platform for retirement income. Mr. Golden previously served as Executive Vice President of AXA Equitable, where he led the firm’s entry into the third-party sale of variable annuities as head of AXA Equitable’s Product Management and Marketing Group. Starting in 1987, Mr. Golden was Founder and President of BT Variable (originally Golden Financial Group). BT Variable developed, issued and administered innovative variable annuity and variable life products.

In the mid-1980’s Mr. Golden was President of Monarch Resources, the variable life subsidiary of Monarch Capital. Prior to joining Monarch in 1979, Mr. Golden was instrumental in developing the Equitable Variable Life Insurance Company (“EVLICO”), and led the introduction of the first variable life insurance products in the U.S. Additional information regarding Mr. Golden’s employment history is included below.

Recent Employment History (Last 5 Years):

President, Golden Retirement Advisors, Inc.	03/2011 to Present
President, Golden Retirement, LLC	06/2009 to Present
President, 2Income Annuity Group, Inc.	11/2015 to Present

B. Other Business Activities of Principal Officers and Additional Compensation

Mr. Golden has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations. Mr. Golden receives additional compensation from these business activities.

C. Performance Fee Calculations

GRA does not charge performance-based fees for its advisory services. The fees charged by GRA are as described in Item 5 (Fees and Compensation) above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding GRA or its advisory persons. Neither GRA nor its advisory persons have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against GRA or its advisory persons.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding GRA or its advisory persons.

However, we do encourage you to independently view the background of GRA's advisory persons on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter the CRD# for the Individual in the respective field.

Jerome S. Golden, President -- 832123

E. Material Relationships with Issuers of Securities

GRA and advisory personnel do not have any relationships or arrangements with issuers of securities.

F. Supervision

Mr. Golden serves as the Chief Compliance Officer of GRA, supervising all advisory persons and business activities. Mr. Golden can be reached at (917) 975-5116 or by email at jsg@goldenretirement.com.

GRA has implemented a Code of Ethics and internal compliance that guide each employee of the Advisor in meeting their fiduciary obligations to Clients of GRA. Further, GRA is subject to regulatory oversight by various agencies. These agencies require registration by GRA and its advisory personnel. As a registered entity, GRA is subject to examinations by regulators, which may be announced or unannounced. GRA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

G. Requirements for State-Registered Advisors

State Registered Advisors are explicitly required to disclose any financial, civil or regulatory matters to their Clients. As noted above, GRA and advisory personnel have never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against GRA or advisory personnel.

Form ADV Part 2B – Individual Disclosure Brochure

for

Jerome S. Golden
President

Effective: March 31, 2020

This Brochure Supplement provides information about the background and qualifications of Jerome S. Golden (CRD# 832123) in addition to the information contained in the Golden Retirement Advisors, Inc. (“GRA” or the “Advisor” CRD #156780) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or GRA’s Disclosure Brochure, please contact us at (212) 763-3380 or by email at info@goldenretirement.com.

Additional information about Jerome S. Golden is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jerome S. Golden is the President of Golden Retirement Advisors, Inc. Mr. Golden, born in 1944, is actively involved with the daily operations of GRA and in managing Client accounts. Mr. Golden earned a Bachelor of Arts from University of Michigan in 1965. Additional information regarding Mr. Golden’s employment history is included below.

Employment History:

President, Golden Retirement Advisors, Inc.	03/2011 to Present
President, Golden Retirement, LLC	06/2009 to Present
President, 2Income Annuity Group, Inc.	11/2015 to Present
Income Management Group, MassMutual Financial Group	06/2005 to 05/2009
Registered Representative, MML Investors Services, Inc	06/2005 to 05/2009
President and CEO, Golden Retirement Resources, Inc	07/1999 to 05/2005

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Golden. Mr. Golden has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Golden.

Securities laws require an advisor to disclose any instances where the advisor or advisory personnel have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Golden.

However, we do encourage you to independently view the background of Mr. Golden on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 832123 in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Mr. Golden is actively involved with the daily operations of GRA and in conducting retirement income planning. Mr. Golden does have additional business activities that are detailed in ADV Part 2A, Item 10 - Other Financial Activities and Affiliations.

Item 5 – Additional Compensation

Mr. Golden does have additional business activities that are detailed in ADV Part 2A, Item 10 - Other Financial Activities and Affiliations. He can receive additional compensation from these business activities.

Item 6 – Supervision

Mr. Golden serves as the President and Chief Compliance Officer of Golden Retirement Advisors, Inc. Mr. Golden can be reached at (917) 975-5116.

Golden Retirement Advisors has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of GRA. Further, Golden Retirement Advisors is subject to regulatory oversight by various agencies. These agencies require registration by GRA and its employees. As a registered entity, GRA is subject to examinations by regulators, which may be announced or unannounced. GRA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Golden does not have any additional information to disclose.