Form ADV Part 2A – Firm Brochure

Item 1: Cover Page

March 28, 2026

GW BLAKE & COMPANY
Asset Management

GW Blake & Company, Inc.
101425 Overseas Hwy #120.
Key Largo, FL 33037
Ph: (850) 492-5253
CRD# 310742

Firm Contact: Gary W. O'Flanagan
President/CEO

This Brochure provides information about the qualifications and business practices of GW Blake & Company, Inc. If you have any questions about the contents of this Brochure, please contact our Firm by telephone at (850) 492-5253. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any State Securities Authority.

Additional information about GW Blake & Company, Inc. is also available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Please note that the use of the term "registered investment adviser" and description of GW Blake & Company, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our Firm's associates who advise you for more information on the qualifications of our Firm and our supervised persons.

Item 2: Material Changes

Annual Update

GW Blake & Company, Inc. updates this Material Changes section when material information related to our Firm and our business, contained in this Disclosure Brochure ("Brochure"), has changed since the last annual release of the Firm's Brochure.

Material Changes Since the Last Update

GW Blake & Company, Inc. is required to advise you of any material changes to our Firm's Brochure, from our last Brochure update. We must state clearly that we are discussing only *material changes* since the last update of our Brochure.

We have changed our address to 101425 Overseas Hwy, #120, Key Largo FL. 33037 effective 03/06/2026.

Full Brochure Available

To receive a free complete copy of our Firm's Brochure, please contact us by telephone at (850) 492-5253.

Item 3: Table of Contents

Item 1: Cover Page 1
Item 2: Material Changes 2
Item 3: Table of Contents 3
Item 4: Advisory Business 4
Item 5: Fees and Compensation 5
Item 6: Performance-Based Fees and Side-By-Side Management 7
Item 7: Types of Clients and Account Requirements 7
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss 8
  Investment Strategies 8
  Risk of Loss 9
  Margin Disclosure Statement 9
Item 9: Disciplinary Information 10
Item 10: Other Financial Industry Activities and Affiliations 10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading 10
Item 12: Brokerage Practices 12
Item 13: Review of Accounts or Financial Plans 15
Item 14: Client Referrals and Other Compensation 15
Item 15: Custody 17
Item 16: Investment Discretion 18
Item 17: Voting Client Securities 18
Item 18: Financial Information 18
Item 19: Requirements for State Registered Advisors 18
Item 20: Additional Information about our Firm 19
  Business Continuity Plan 19
  Disasters 19
  Information Security Program 19
    Information Security 19
    Privacy Policy Notice 19
    Sharing Non-Public Personal and Financial Information 20
    Opt-Out Provisions 20

Part 2B Supplemental Brochures
  Gary W. O'Flanagan 21

Item 4: Advisory Business

A. Description of our advisory Firm, including how long we have been in business and our principal owner(s).

GW Blake & Company, Inc. is a Florida state registered investment adviser that specializes in financial asset management.

Our Firm is an Incorporated company formed and in good standing in the State of Florida. GW Blake & Co. has been in business as an investment adviser since 2020.

The Firm is owned wholly by Gary W. O'Flanagan, President and CEO. You can find his respective individual qualifications and business experience in the ADV Part 2B Supplemental Brochures in the back of this Brochure.

GW Blake & Company, Inc.' principal business office is located in the City of Key Largo, FL. No Firm records are maintained in any location other than the principal business location.

B. Description of the types of advisory services we offer.

Non-Wrap Asset Management:

Through our Non-Wrap Asset Management service agreement, we provide continuous and regular account supervision of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other securities or investments. The client's individual investment strategy is tailored to their specific needs and stated objectives and may include some or all the previously mentioned securities. Each portfolio will be designed to meet each client's particular investment goal, which we determine to be suitable according to the client's stated personal and financial circumstances.

We may also provide a variety of financial consulting and planning services to individuals, families and other clients in the "non-wrap" management of their financial resources based on an analysis of the client's current personal and financial situation, goals, and objectives. This consulting may encompass one or more of the following areas: Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Insurance Analysis, and Business and Personal Financial Planning.

Our financial consultations rendered to clients usually include personalized recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services.

C. Explanation of whether (and, if so, how) (i) we tailor our advisory services to the individual needs of clients, and (ii) whether clients may impose restrictions on investing in certain securities or types of securities.

(i) We offer individualized investment advice to clients utilizing our Non-Wrap Asset Management service.

(ii) Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. Restrictions would be limited to our Non-Wrap Asset Management services.

D. Disclosure of the amount of client assets we manage on a discretionary basis and the amount of client assets we manage on a non-discretionary basis.

In total, GW Blake & Co. manages approximately 13 accounts representing approximately $1.55 million in assets. We manage 13 accounts representing $1.55 million on a discretionary basis, and zero accounts representing $0.0 million on a non-discretionary basis, as of December 31, 2025.

Item 5: Fees and Compensation

We are required to describe our brokerage, custody, fees, and fund expenses so you will know how much you are charged and by whom for our advisory services provided to you. Our fees are generally negotiable by our Firm's discretion.

A. Description of how we are compensated for our advisory services provided to you.

GW Blake & Company, Inc.'s annual fees for Non-Wrap Asset Management shall be based on a negotiated percentage of the market value of the assets under management, not to exceed 1.75%. GW Blake & Co. fee breaks will occur as assets in your portfolio increases past the following tiers:

Tiers	
Tier 1:	Assets from **$0.00 - $250,000.00** are billed at an annual rate of **1.7500%**
Tier 2:	Assets from **$250,000.01 - $500,000.00** are billed at an annual rate of **1.5000%**
Tier 3:	Assets from **$500,000.01 - $1,000,000.00** are billed at an annual rate of **1.2500%**
Tier 4:	Assets from **$1,000,000.01 - $2,000,000.00** are billed at an annual rate of **1.0000%**
Tier 5:	Assets from **$2,000,000.01 - $5,000,000.00** are billed at an annual rate of **0.7500%**
Final Tier:	Assets above **$5,000,000.01** are billed at an annual rate of **0.5000%**

Our Firm's fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter or the opening balance at the time of enrollment of the Non-Wrap Asset Management Service.

B. Description of whether we deduct fees from clients' assets or bill clients for fees incurred.

As stated above, our Firm's fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter or the opening balance at the time of enrollment of the Non-Wrap Asset Management Service. Fees will be automatically deducted from your managed account or other accounts as designated. As part of this process, you understand and acknowledge the following:

(i) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the Assets and all disbursements in your account including the amount of the advisory fees paid to us;

(ii) You provide written authorization permitting us to be directly paid by these terms;

(iii) We verify the value of the assets the fees are based on, how they are calculated and the ultimate dollar amount of the fees with the custodian and will send the custodian an invoice of the amount of the fee to be deducted from your account.

(iv) We will concurrently send our clients an invoice itemizing the fee. Itemization will include the formula used to calculate the fee, the amount of assets under management on which the fee is based and the time period covered by the fee.

In certain circumstances, clients may be billed directly, such as when a client does not wish for funds to be withdrawn from a particular managed account (e.g., retirement accounts, custodial accounts, etc.), but rather prefers to send their quarterly fee payment by check.

C. Description of any other types of fees or expenses clients may pay in connection with our advisory services, such as custodian fees or mutual fund expenses.

Non-wrap fee clients may incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the Firm that the trades are executed through. Also, clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

D. We must disclose if client's advisory fees are due quarterly in advance. Explain how a client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period. Explain how you will determine the amount of the refund.

We charge our advisory fees quarterly in advance. If you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination,

we will proceed to close out your account and process a pro-rata refund of unearned advisory fees.

E. **Commissionable securities sales.**

We do not sell securities for a commission or offer commission-based securities services. However, investment adviser representatives of GW Blake & Co. may also be Florida independent insurance agents who can offer insurance products and services, for which they would receive a non-securities insurance commission, in their capacity as independent insurance agents.

If clients purchase insurance from a GW Blake & Co. investment adviser representative in their capacity as insurance agent, the investment adviser representative will receive a commission directly from the chosen insurance company. This may present a conflict of interest for GW Blake & Co. since the IAR would have incentive to sell insurance for a commission. GW Blake & Co. mitigates this conflict by full disclosure to clients, both verbal and written, and provides this Disclosure Brochure which clients are encouraged to read carefully. Client have the right to purchase any insurance product or service recommendation from other insurance brokers or agents. Insurance commissions you pay may be higher or lower when purchased through a GW Blake & Co. affiliated independent insurance agent

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

We do not charge performance fees to our clients.

Item 7: Types of Clients and Account Requirements

We have the following types of clients:

- Individuals and High Net Worth Individuals
- Trusts, Estates or Charitable Organizations and Endowments
- Pension and Profit-Sharing Plans
- Corporations, limited liability companies and/or other business types.

In general, we require a minimum of $150,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

A. Description of the methods of analysis and investment strategies we use in formulating investment advice or managing assets.

Methods of Analysis:

Charting. In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular stock against the overall market to predict the price movement of the security.

Investment Strategies:

Long-term purchases. When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

*Short-term purchase*s. When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Trading. We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Short sales. We borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares

are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares. If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Margin transactions. We will purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash and allows us to purchase stock without selling other holdings.

Option writing. We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

Risk of Loss:

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease, and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have. Securities investments and strategies are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk and overall investment objectives.

IARs work with advisory clients to determine suitable allocation models and overall investment strategies during a client's initial in-depth discovery meeting. Clients are asked questions related to their needs, values, interests, relationships, goals, tolerance for risk and market exposure, other current advisors and all other assets. Clients should discuss their objectives and risk tolerance with their IAR thoroughly. No assumption can be made that any strategy will provide better returns than other investment strategies.

MARGIN DISCLOSURE STATEMENT

Use of Margin: Securities purchased on margin are used as the account custodian's collateral for the margin loan made to an advisory clients' account. If the securities in an account declines in value, so does the value of the collateral supporting the margin loan, and, as a result, the account custodian can take action, such as issue a margin call and/or sell securities or other assets in any of the accounts held with that custodian Firm, to maintain the required equity in the account. It is important that Clients fully understand the risks involved in trading securities on margin.

Margin risk includes the following:

- You can lose more funds than you deposit in the margin account.
- The account custodian can force the sale of securities or other assets in your account(s).
- The Firm can sell your securities or other assets without contacting you.

- You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.
- The account custodian can increase its "house" margin maintenance requirements at any time and is not required to provide you advance written notice.
- You are not entitled to an extension of time on a margin call.

When clients execute transactions using margin, they must keep these important rules and conditions in mind. Clients with any questions or concerns are advised to contact your Advisor Representative, or GW Blake & Co. Advisor's Chief Compliance Officer, Gary O'Flanagan.

B. Our practices regarding cash balances in client accounts, including whether we invest cash balances for temporary purposes and, if so, how.

We generally invest client's cash balances in money market funds, bank deposits, FDIC Insured Certificates of Deposit, high-grade commercial paper, and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that, with your written agreement, the account custodian may debit advisory fees for our services related to asset management, as applicable.

Item 9: Disciplinary Information

We are required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business, selection of an Adviser, or the integrity of our management.

GW Blake & Company, Inc., does not have any disciplinary events applicable to this item.

Item 10: Other Financial Industry Activities and Affiliations

GW Blake & Co. and its supervised persons have no other financial industry activities or affiliations, and therefore, we have nothing to disclose in this regard.

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

A. Brief description of our Code of Ethics adopted pursuant to SEC rule 204A-1 and offer to provide a copy of our Code of Ethics to any client or prospective client upon request.

The GW Blake & Co. investment adviser representatives have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

We recognize that the personal investment transactions of members and employees of our Firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client.

At the same time, we believe that if investment goals are similar for clients and for members and employees of our Firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, to prevent conflicts of interest, we have in place a set of procedures with respect to transactions effected by our members, officers and employees ("employees") for their personal accounts. To monitor compliance with our personal trading policy, all employees are required to provide written notification to the compliance department of any personal trade within the same day of trade execution. Further, trade blotters, including employee's personal trades, are reviewed by compliance on a weekly basis. Our Firm has established a Code of Ethics which applies to all our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures.

We require all our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws always. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Our Firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

B. If our Firm or a related person invests in the same securities (or related securities, e.g., warrants, options or futures) that our Firm or a related person recommends to clients, we are required to describe our practice and discuss the conflicts of interest this presents and generally how we address the conflicts that arise in connection with personal trading.

See Item 11A of this Brochure. Related persons of our Firm may buy or sell securities and other investments that are also recommended to clients. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our Firm's Code of Ethics, a copy of which is available upon request.

C. If our Firm or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or a related person buys or sells the same securities for our Firm's (or the related person's own) account, we are required to

describe our practice and discuss the conflicts of interest it presents. We are also required to describe generally how we address conflicts that arise.

See Item 11A of this Brochure. Related persons of our Firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our Firm's Code of Ethics, a copy of which is available upon request.

D. If our Firm or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or a related person buys or sells the same securities for our Firm's (or the related person's own) account, we are required to describe our practice and discuss the conflicts of interest it presents. We are also required to describe generally how we address conflicts that arise.

See Item 11A of this Brochure. Related persons of our Firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our Firm's Code of Ethics.

Furthermore, our related persons may buy or sell the same securities on the same day they buy or sell for our clients. However, the pricing will always benefit the client, or the trade will be part of a block trade at the same price.

Item 12: Brokerage Practices

A. Description of the factors that we consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Our Firm generally recommends that clients establish brokerage accounts with Schwab to maintain custody of their assets and to effect trades for their account(s). Schwab may provide us with access to their institutional custody and trading services, which are typically not available to Schwab retail investors. Schwab's services may also include research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. Please note, however, that our Firm is independently owned and operated and is not affiliated with Schwab, and we may recommend that clients establish accounts with custodial clearing Firms other than Schwab.

For client accounts maintained in their custody, Schwab charges separately for trading and is not compensated by our Firm out of the advisory fees that we charge. Our Firm places trades for clients' accounts subject to its duty to seek best execution and its other fiduciary duties. While our Firm may use broker-dealers other than Schwab to execute trades for client accounts maintained at Schwab, this practice may result in additional costs to clients, so that we are more likely to place trades through Schwab rather than other broker-dealers.

Schwab's execution quality may be different than other broker-dealers. Neither our Firm, nor any of its principals and/or employees, receives any portion of the brokerage commissions and/or transaction fees directly charged by a broker-dealer.

(i). Research and Other Benefits. If we receive non-soft dollar research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions, we are required to disclose our practices and discuss the conflicts of interest they create. Please note that we must disclose all benefits we receive, including, in the case of research, both proprietary research (created or developed by the broker-dealer) and research created or developed by a third party.

Our Firm has an arrangement with Schwab which provides us with their "platform" services. Schwab's services include, among others, brokerage, custodial, compliance and administrative support, record keeping and related services that are intended to support our Firm in conducting business and in serving the best interests of our clients.

Schwab also makes certain research and brokerage services available at no additional cost to our Firm. These are non-soft-dollar services, which includes certain research and brokerage services, including research services obtained by Schwab directly from independent research companies, as selected by our Firm (within specific parameters).

Research products and services provided by Schwab to our Firm may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Schwab to our Firm in the performance of our investment decision-making responsibilities.

The aforementioned research and brokerage services are used by our Firm to manage accounts for which we have investment discretion. Without this arrangement, our Firm might be compelled to purchase the same or similar services at our own expense.

We may also gain access to products and services that will help us in managing and administering client accounts. These include software and other technology that: provide access to client account data (i.e. trade confirmations and account statements); facilitate trade executions; provide research, pricing information, and other market data; facilitate in the payment of our Firm's fees from its clients' accounts; and assist with back-office functions, record-keeping, and client reporting. Many of these services may be used to service all or a substantial number of our accounts.

As a result of receiving the services for no additional cost, we may have an incentive to continue to use or expand the use of Schwab's services. Our Firm examined this

conflict of interest when we chose to enter into the relationship with Schwab and we have determined that the relationship is in the best interest of our Firm's clients and satisfies our client fiduciary obligations, including our duty to seek best execution.

Schwab charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain mutual funds, commissions are charged for individual equity and debt securities transactions). In some instances, Schwab does charge transaction fees to clients. Schwab enables us to obtain many no-load mutual funds without transaction charges and other funds at nominal transaction charges.

Schwab's commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by Schwab may be higher or lower than those charged by other custodians and broker-dealers. The investment research products and services that may be obtained by our Firm will generally be used to service all our clients.

(ii). Compensation for Client Referrals

Our Firm does not receive compensation for client referrals.

(iii). Directed Brokerage

Neither we nor any of our Firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are affected.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay.

ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

B. **Discussion of whether, and under what conditions, we aggregate the purchase or sale of securities for various client accounts in quantities sufficient to obtain reduced transaction costs (known as bunching).**

If we do not bunch orders when we have the opportunity to do so, we are required to explain our practice and describe the costs to clients of not bunching.

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our Firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation

Item 13: Review of Accounts or Financial Plans

A. Review of client accounts or financial plans, along with a description of the frequency and nature of our review, and the titles of our employees who conduct the review.

Once the appropriate portfolio has been determined, we review the portfolio periodically and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Only our registered Financial Advisors will conduct reviews.

B. Review of client accounts on other than a periodic basis, along with a description of the factors that trigger a review.

Among the factors which may trigger a review are major market or economic events, the client's life events or changes in lifestyle, requests by the client, etc.

C. Description of the content and indication of the frequency of written or verbal regular reports we provide to clients regarding their accounts.

We do not provide written reports to clients, unless asked to do so. Customers receive an account statement from Charles Schwab (or other designated account custodian) at least quarterly. Verbal reports to Non-Wrap Asset Management clients take place on at least an annual basis.

Item 14: Client Referrals and Other Compensation

A. If someone who is not a client provides an economic benefit to our Firm for providing investment advice or other advisory services to our clients, we must generally describe the

arrangement. For purposes of this Item, economic benefits include any sales awards or other prizes.

We do not receive economic benefits (sales awards or other prizes) for providing investment advice to our clients other than from our clients based on the terms of their individual client agreement.

Our Firm may recommend that clients establish brokerage accounts with Schwab, to maintain custody of our clients' assets and to effect trades for their accounts.

Our Firm is independently owned and operated and not affiliated with Schwab. Our Firm may also recommend that clients establish accounts with firms other than Schwab. Our Firm places trades for its clients' accounts subject to its duty to seek overall benefit to our clients and act in our clients' best interests at all times. Our Firm may use broker-dealers other than Schwab to execute trades for client accounts maintained at Schwab, but this practice may result in additional costs to clients so that we are more likely to place trades through Schwab rather than other broker- dealers. Some of the products, services and other benefits provided by Schwab benefit us and may not benefit our Firm's client accounts. Our recommendation of a client placing assets in Schwab's custody may be based in part on benefits Schwab provides to us, and not solely on the nature, cost or quality of custody and execution services provided by Schwab.

In addition to the benefits described in Item 12.A.1 of this Brochure, Schwab also makes available to our Firm other products and services that benefit us but may not benefit our clients' accounts. These non-soft-dollar benefits may include national, regional or investment adviser specific educational events organized and/or sponsored by Schwab. Other potential benefits may include occasional business entertainment of personnel of our Firm by Schwab personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Schwab also makes available to our Firm other services intended to help our Firm manage and further develop our business enterprise. These services may include professional compliance assistance, legal and business consulting, and publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance, and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to our Firm by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our Firm.

While, as a fiduciary, our Firm endeavors to act in its clients' best interests, our recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to our Firm of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost, or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

As a result of receiving the aforementioned products and services for no cost, we may have an incentive to continue to place client trades through Schwab. This interest conflicts with the clients' interest of obtaining the lowest commission rate available. Therefore, we must

determine in good faith, based on the best execution policy stated above in Item 12, that such commissions are reasonable in relation to the value of the services provided by Schwab.

Our Firm examined this potential conflict of interest when we chose to enter into the relationship with Schwab and we have determined that the relationship is in the best interest of our Firm's clients and satisfies our client fiduciary obligations.

From time to time, our Firm may make an error in submitting a trade order on a client's behalf. When this occurs, we may place a correcting trade with the broker-dealer which has custody of the client's account. If an investment gain results from the correcting trade, the gain will remain in the client's account unless the same error involved other client account(s) that should have received the gain, it is not permissible for the client to retain the gain, or our Firm confers with the client and the client decides to forego the gain (e.g., due to tax reasons).

B. If our Firm or a related person directly or indirectly compensates any person who is not our employee for client referrals, we are required to describe the arrangement and the compensation.

We do not pay referral fees to independent solicitors (non-registered representatives) for the referral of their clients to our Firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.

Item 15: Custody

Custody, as it applies to investment advisors, has been defined as having access or control over client funds and/or securities, but does not include the ability to execute transactions in client accounts. Custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser may be deemed to have custody for purposes of the *Investment Advisers Act of 1940* and must ensure proper procedures are implemented.

We are deemed to have limited custody of client funds and securities whenever we are given the standing authority to have fees deducted directly from client accounts, or if we service our clients utilizing standing client authority to send their funds upon their instructions to a third party (standing letter of authorization, or "SLOA"). However, regulators have deemed that just having the authorization to trade in client accounts is not itself defined as having custody.

For accounts where we are deemed to have this limited custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients, or an independent representative of the client, will direct, in writing, the creation of all accounts, and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained.

Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those

statements and are urged to compare the statements against any reports or investment summaries received from us.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Item 16: Investment Discretion

Our clients need to sign a discretionary investment advisory agreement with our Firm for the management of their account. This type of agreement only applies to our non-wrap asset management clients. We do not take or exercise discretion with respect to our other non-discretionary clients.

Item 17: Voting Client Securities

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. If proxies are sent to our Firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Item 18: Financial Information

We do not require, nor do we solicit prepayment of more than $500 in fees per client, six months or more in advance. Neither our Firm nor have any of our associates been the subject of a bankruptcy petition at any time during the past ten years.

Item 19: Requirements for State Registered Advisors

Gary W. O'Flanagan
Year of Birth: 1963
Formal Education:

- UC Davis, Intensive Brewing Science for Practical Brewing

Business Background for the Previous Five Years:

- GW Blake & Company Inc., President, 09/2020 to Present
- Amy's Wicked Slush, Vice President/Co-Founder, 09/2016 to 12/2019
- Mendocino Brewing Co., Brewer, 09/2000 to 06/2017

Item 20: Additional Information about our Firm

Business Continuity Plan

GW Blake & Company, Inc. has a business continuity plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people in a variety of business disruptions. This Plan is tested at least annually to ensure continuity for our clients and employees.

Disasters

The business continuity plan covers natural disasters such as earthquakes, snowstorms, hurricanes, tornados, and flooding, as well as pandemic emergencies. The plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, telephone communications outage, and internet outage. We back up and encrypt electronic files daily and store them in the cloud or off-site.

Alternate Offices

We have implemented various technology solutions, including the ability to utilize remote server and VPN applications, to support ongoing operations if our main office is unavailable. We will contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

To help minimize the potential disruption caused by a loss of key personnel, client advice and service is delivered using a team approach. We have identified both local and national business continuation partners who can be called upon for support in the event of the owners' serious disability or death.

INFORMATION SECURITY PROGRAM Information Security

GW Blake & Company, Inc. maintains an information security program to minimize the risk that your personal and confidential information may be breached.

Privacy Policy Notice

Your relationship with GW Blake & Co. is based on trust and confidence. To fulfill our responsibilities to you, GW Blake & Co. requires that you provide current and accurate financial and personal information. You deserve to expect that GW Blake & Co. will protect the information you have provided in a manner that is reasonably safe, secure and professional. GW Blake & Co. and its supervised persons are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours, access to customer records is monitored so that only those with approved entitlements may access the files. During hours in which the company is not in operation, the customer records will be secured.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe GW Blake & Co. procedures regarding customer and consumer privacy will result in disciplinary action against that individual and may include termination.

Sharing Non-Public Personal and Financial Information

GW Blake & Co. is committed to the protection and privacy of its customers' and consumers' personal and financial information. GW Blake & Co. will not share such information with any non-affiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the Firm;
- In connection with a sale or merger of GW Blake & Co.'s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's instruction or consent; or
- Pursuant to any other exceptions enumerated in the Florida Information Protection Act.

Opt-Out Provisions

It is not a policy of GW Blake & Company, Inc. to share non-public personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to "opt out".

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice. We reserve the right to change this policy at any time and you will be notified in advance if any changes do occur.

We are required by law to deliver this Privacy Notice to you annually, in writing. If you have any questions after reading this Privacy Notice, please contact us by writing to: GW Blake & Company, 9812 Bridgewood Ln., Pensacola, Fl 32514.

Form ADV Part 2B – Brochure Supplement

Item 1: Cover Page

October 11, 2020

GW BLAKE & COMPANY
Asset Management

Gary W. O'Flanagan

CRD# 1780499
President/CEO & Chief Compliance Officer
101425 Overseas Hwy. #120.
Key Largo, FL 33037
Ph: (850) 492-5253
gary@gwblake.com

This Brochure supplement provides information about Gary W. O'Flanagan that supplements GW Blake & Company, Inc.'s ADV Part 2A Firm Brochure. You should have received a copy of that Brochure. Please contact GW Blake & Company at (850) 492-5253, if you did not receive GW Blake & Company's Brochure or if you have any questions about the contents of this supplement, or Mr. O'Flanagan.

Additional information about Mr. O'Flanagan is also available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Although GW Blake & Co. may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.

Item 2: Educational Background and Business Experience

Gary W. O'Flanagan
Year of Birth: 1963

Formal Education: Gary O'Flanagan has studied Intensive Brewing Science for Practical Brewing at UC Davis and He has also successfully passed his Series 7, Series 63 and Series 65 examinations.

Business Background: Mr. O'Flanagan served in various capacities in business, including the following:

Name of Business	Title	Period of Employment
GW Blake & Company	President/CEO	09/2020 - Present
Amy's Wicked Slush	Co-Owner	09/2016 - 12/2019
Mendocino Brewing Co.	Master Brewer	09/2000 – 06/2017

Item 3: Disciplinary Information

If there are legal or disciplinary events material to your evaluation of Gary O'Flanagan, we are required to disclose all material facts regarding those events. Gary O'Flanagan does not have any disciplinary events to disclose.

Item 4: Other Business Activities

Gary O'Flanagan does not receive any additional compensation for providing advisory services beyond the fee-based compensation he receives through GW Blake & Company, Inc.

Item 5: Additional Compensation

Gary O'Flanagan does not receive any additional compensation for providing advisory services beyond that received as a result of his capacity as President/CEO and Investment Adviser Representative of GW Blake & Company, Inc.

Also, please refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of GW Blake & Company's Firm Brochure for additional disclosures on this topic.

Item 6: Supervision

As President/CEO of GW Blake & Company, Inc., Gary W. O'Flanagan is not supervised by other persons. Mr. O'Flanagan can be reached at the telephone number listed on the cover page of this Brochure.

Item 7: Requirements for State-Registered Advisers

Mr. O'Flanagan does not have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization proceeding or administrative proceeding, and has not been the subject of a bankruptcy petition.