

**AmeriTrust Investment Advisors, Inc.
4506 S Harvard Ave
Tulsa, Oklahoma 74135**

Phone: 918-610-8080

Fax: 918-610-1229

Web Site: <https://argentfinancial.com/subsidiary/ameritrust-investment-advisors>

March 28, 2025

**FORM ADV PART 2A.
BROCHURE**

MATERIAL CHANGES

None

This brochure provides information about the qualifications and business practices of AmeriTrust Investment Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at 918-610-8080. 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 AmeriTrust Investment Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for AmeriTrust Investment Advisors, Inc. is 108589.

AmeriTrust Investment Advisors, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Table of Contents

<i>Advisory Business</i>	<i>1</i>
<i>Fees and Compensation</i>	<i>3</i>
<i>Performance-Based Fees and Side-By-Side Management.....</i>	<i>5</i>
<i>Types of Clients.....</i>	<i>6</i>
<i>Methods of Analysis, Investment Strategies and Risk of Loss</i>	<i>7</i>
<i>Disciplinary Information</i>	<i>9</i>
<i>Other Financial Industry Activities and Affiliations</i>	<i>10</i>
<i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</i>	<i>11</i>
<i>Brokerage Practices</i>	<i>12</i>
<i>Review of Accounts</i>	<i>13</i>
<i>Client Referrals and Other Compensation.....</i>	<i>15</i>
<i>Custody</i>	<i>16</i>
<i>Investment Discretion.....</i>	<i>17</i>
<i>Voting Client Securities.....</i>	<i>18</i>
<i>Financial Information</i>	<i>19</i>
<i>Requirements for State-Registered Advisers</i>	<i>20</i>
<i>Additional Information.....</i>	<i>21</i>

Advisory Business

Form ADV Part 2A, Item 4

AmeriTrust Investment Advisors, Inc.'s registration was granted by the U.S. Securities and Exchange Commission on April 10, 1997. The firm currently maintains registration in the state of Oklahoma. Kenny Brown, Jr. (CRD Number 6862043) is President of the firm. The Argent Financial Group, Inc. (EIN 72-1173060) owns one hundred (100%) percent of the equity of the firm. The firm is not publicly owned or traded. As of December 31, 2024, the firm managed, on a discretionary basis, \$60,840,352 which represented 192 accounts. Client assets are managed on an individualized basis.

Approximately 70% of the services rendered are investment supervisory services and 30% are financial planning services. Fees for these services may be based on: 1) a percentage of assets under management; 2) hourly charges; or 3) fixed fees. See "Fees and Compensation" for details of the fees.

Financial Planning Services

Firm is a fee-for-service financial planner, defined by the National Association of Personal Financial Advisors (NAPFA) as one who, in all circumstances, is compensated solely by the client, with neither the advisor nor any related party receiving compensation that is contingent on the purchase or sale of a financial product. The Firm may not receive commissions, rebates, awards, finder's fees, bonuses or any form of compensation from others as a result of a client's implementation of the Firm's planning recommendations.

A written financial plan is a special report or analysis, including recommendations on cash flow, income tax, financial independence, investment portfolio, insurance, and estate planning. Firm may recommend to client that specific securities be purchased or sold depending upon the needs of each client. Depending on the engagement selected by a client, investment advice may be furnished in a manner we have not described above, although we cannot determine what form it might take at this time.

Investment Advisory Services

Firm also provides asset management services on a discretionary basis.

Clients may impose restrictions on investing in certain securities or types of securities by including these restrictions in the Investment Guidelines which are signed by the client, or by submitting to the Firm a written instruction regarding the restrictions.

Firm will serve as investment consultant to plan sponsors for fees based upon time required. Fees for such services are negotiable and payable after service is performed.

This Firm does not participate in wrap fee programs.

The Equity and Fixed Income investment philosophy of AmeriTrust Investment Advisors, Inc., as well as a description of the Asset Allocation Process, is incorporated into a handout which is provided to all investment management prospects.

Miscellaneous

Pontera. The Registrant uses Pontera, a third-party platform to facilitate the management of held away assets such as defined contribution plan participant accounts, with discretion. Those clients who choose to engage the Registrant to service their held away accounts will be provided a link to connect their outside accounts to the platform. Once the client's account(s) is connected to the platform, Registrant will review the client's current account allocations. Registrant will rebalance the connected outside accounts consistent with the client's investment goals and risk tolerance. Client account(s) will be reviewed at least quarterly.

Retirement Plan Rollovers - No Obligation/Conflict of Interest. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted; (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted; (iii) roll over to an Individual Retirement Account ("IRA"); or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If the Registrant provides a recommendation as to whether a client should engage in rollover or not, the Registrant is acting as an ERISA fiduciary by making such recommendation. Furthermore, if the Registrant recommends that a client roll over his/her retirement plan assets into an account to be managed by the Registrant, such a recommendation creates a conflict of interest if the Registrant will earn new (or increase its current) compensation as a result of the rollover. If Registrant provides a recommendation as to whether a client should engage in a rollover or not, Registrant is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by Registrant, whether it is from an employer's plan or an existing IRA.

Fees and Compensation

Form ADV Part 2A, Item 5

Fee Schedule

Special definitions shall apply to the following terms wherever they appear in this fee schedule. On occasion, there are circumstances that will cause modification of the fee schedule.

Total Net Worth - The total assets minus total liabilities.

INITIAL PLAN FEES

<u>Total Net Worth</u>	<u>Annual Fee</u>
On the first \$2,000,000	0.4% (4/10 of 1%)
Net Worth exceeding \$2,000,000	0.25% (25/100 of 1%)
Minimum Plan Fee	\$4,000

Initial Plan fees include ten (10) hours of implementation time following the report presentation to the client within the first year. 25% of the fees are due when worksheets are sent to client after the initial engagement; 50% is to be paid following the report presentation; and the balance is due within sixty (60) days after the report presentation.

The initial analysis and recommendations are presented in a written report covering the following areas of the client's personal financial situation: Income Tax Analysis; Cash Flow/Cash Management Analysis; Financial Independence/Retirement Planning; Investment Planning & Asset Allocation/Portfolio Design; Risk Management; Estate Tax and Estate Transition Planning; Education Planning (as appropriate).

ANNUAL UPDATE AND REVIEW FEES

.25% of Total Net Worth

Annual update and review fees are billed quarterly (on the last day of the quarter) in March, June, September, and December. Prepayment is not required; however, some clients choose to prepay fees based on the above calculations, which is unsolicited.

Termination of Agreement and Refund of Fees

If termination of financial planning services is requested at any time, the actual hours incurred would be charged at the hourly rate of \$300.00. Payment over that charged amount would be refunded. No assignment of the contract shall be made by the investment adviser without the consent of the other party to the contract.

Other forms of fees used for limited engagements include:

Annual Retainer: Quoted based on services desired

Hourly Rate: \$300.00 per hour for Certified Financial Planner
\$175.00 per hour for financial planners/support personnel

Investment Advisory Services

The published fees are normally deducted from the clients' assets quarterly and are based upon a percentage of the market value of the assets under management. The market value is determined as of the end of the quarter.

<u>Account Market Value</u>	<u>Annual Fee</u>
On the first \$1,000,000	1.25%
On the next \$2,000,000	.95%
On the next \$2,000,000	.75%
On the next \$5,000,000	.50%
Over \$10,000,000	Quoted

Minimum Fee: Annual fees may be subject to a minimum charge of \$5,000 per year.

Brokerage fees are incurred when trades are executed; however, Firm does not receive any of these fees. See "Brokerage Practices".

Note: Fees are based on the market value of the total assets managed. Assets may be invested in money market funds or mutual funds which charge fees within the fund. No fees are required prior to beginning services, and accounts have immediate termination rights unless otherwise agreed to in writing.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

None.

Types of Clients

Form ADV Part 2A, Item 7

Types of clients are individuals, trusts, estates, charitable organizations, corporations, and other business entities.

Financial Planning Services. Minimum fee for a comprehensive plan is \$4,000. The annual update/review fee is negotiated. Hourly financial planning services are also available.

Investment Advisory Services. Minimum annual fee is \$5,000. For individual managed accounts, a market value of \$400,000 or greater is recommended. The firm will never charge an unreasonable fee, defined by some states as a fee in excess of 3% of the client's assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

METHODS OF ANALYSIS

Asset Management Services: Several contracted services and information sources are used to implement our disciplines in selecting securities for purchase. Our primary emphasis is focused on the individual company or entity using fundamental analysis. This involves determining a company's ability to profitably compete in its industry. Analyzing historical performance and revenue growth, expense controls, and the leverage of the company provides insight as to the company's ability to repeat a positive performance in the future. Although it is impossible to anticipate every scenario that could affect future performance, decisions of management and consistent results provide some level of comfort for the shareholder. The fundamental analysis looks at the company quality, size, continuity of management, historical and pro-forma financial information, and advantages that might exist to maintain or grow market share. Technical analysis of the industry and market outlook is considered to determine if the market is overpriced. An overpriced market could result in a correction to the market.

When analyzing mutual funds, the type of fund, management continuity, historical performance, expense ratio, consistency, and the ability of the manager to remain committed to the investment style are all considered. A database of over 11,000 funds is used to screen funds for purchase and monitoring.

Similar information is reviewed for bonds to determine the ability of the company or government entity to repay the debt obligation. This is done by using independent services which grade bonds, allowing for specific disciplines to be applied. In analyzing municipal securities, the ability of the issuing entity along with the respective state's financial status is considered before buying a bond. General interest rate trends are followed to determine the average maturity to be applied to the portfolio.

Financial Planning Services: The Firm is not generally involved in the selection, recommendation or analysis of individual securities for financial planning clients. The Firm as a financial planner advises as to securities on a broad basis for asset allocation purposes. For example, the Firm's investment advice generally takes the form of recommendations into a prudent diversification of investment assets, especially when there is a heavy concentration in specific securities.

INVESTMENT STRATEGIES AND RISK OF LOSS

Asset Management Services: Various types of risk exist in all investments. Risk in the market, interest rates, company performance, and unexpected events, such as wars, geopolitical events, or natural disasters, can affect the performance of an individual security. The ability of a company or government to overcome risks depends on factors such as size, leverage, income generation, and competition determines both the short-term and long-term performance of a security. Below is a summary of the risks associated with the specific types of securities used in the portfolios we manage:

Common stocks: Since common stocks represent an ownership position in a company, risks associated with the decisions of the company management will affect the price of the shares. Decisions that result in net losses will determine both the short-term and long-term performance. Product liability, competition, illegal activities, and risks associated with suppliers and stability of markets where a company generates income can determine the overall performance.

Bonds: Bonds represent the lending of money to a government or a company for a fixed period of time at a predetermined interest rate. This could take the form of a short-term debt such as a certificate of deposit or a long-term debt such as a 30-year loan to governments or companies. The ability of the entity to repay the debt is a significant risk – the longer the maturity, the more uncertainty of the ability for repayment. As the ability of the issuing entity to repay debt improves, the cost of borrowing usually declines because it is perceived the repayment is stable. General interest rates can increase or decline as decisions are made by government entities. When this occurs, the value of the bonds before maturity can fluctuate due to the demand by lenders.

Mutual Funds: Depending on the underlying investments owned in the mutual fund, the same risks identified for stocks and bonds apply. Other risks may take the form of industry or country concentrations and the demands associated with the additions and distributions from the investors.

Other types of investments, including oil and gas production and real estate, have risks associated with location and supply and demand. Our investment management does not include purchasing these types of investments for clients, but many clients may already own such assets. We may advise regarding the concentration and identified risks that this type of asset represents in a client's overall allocation.

Our focus is on identifying the risks associated with each type of security and managing that risk using the size and quality of the entity and historical performance. A larger company usually has the ability to manage and survive negative events better than a small company. If the company has lower debt, increasing revenues, and good expense management, then its ability to generate net income and compete is more reliable. Diversification among companies in various sectors also assists in spreading risk and minimizing the exposure to an industry event that may cause problems for all companies in that industry. Regardless of the commitment to managing perceived or known risks, it is still possible to have risks occur that can affect the performance of a security. It is important to monitor the companies and react when necessary to minimize the effects of unexpected risks when identified.

Financial Planning Services: Investment strategies will be developed on a custom basis for individuals by preparing and analyzing a client's financial plan composed of tax planning, investment analysis, estate planning, risk management, retirement, and cash flow requirements. From this information, a plan will be developed which may include both short-term and long-term investments in order to obtain a diversified portfolio. The basic goal will be for long-term capital accumulation. This would include diversification of investments, both fixed and variable, and possibly the analysis of insurance products.

Disciplinary Information

Form ADV Part 2A, Item 9

There have been no legal or disciplinary events for this Firm.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Affiliated Investment Companies

Argent Financial Group, Inc., AmeriTrust Investment Advisors' sole owner, is also the sole owner of Argent Fiduciary Consulting Services, LLC (provides consulting and compliance services to trust companies and registered investment advisers); Argent Retirement Plan Advisors, LLC (SEC registered investment adviser firm); Argent Advisors, Inc. (SEC registered investment adviser firm); Wynden Capital Management, LLC (Georgia state registered investment adviser firm); Argent Trust Company (Tennessee Trust Company); Argent Institutional Trust (Florida Trust Company); Argent Trust Company d/b/a Argent Trust Oklahoma, formerly d/b/a AmeriTrust Corporation and Heritage Trust Company; Argent Insurance Services, LLC (insurance); Highland Capital Management, LLC (SEC registered investment adviser firm); Argent Insurance, LLC (insurance); Orleans Capital Management Corp. (SEC registered investment adviser firm); and Argent Wealth LLC (f/k/a Pinnacle Wealth LLC. (See note below concerning Argent Trust Company d/b/a/ Argent Trust Oklahoma).

In certain circumstances, AIA's Associated Persons may refer clients to entities owned by Argent Financial Group, Inc., including those referenced in the immediately preceding paragraph. Those entities may provide services to clients which are not investment related.

The recommendation that a client utilize the services of the above-referenced affiliated entities presents a material conflict of interest, as the associated person making the referral to any of the above entities can receive referral fees from that affiliated entity. In addition, affiliated entities may enter into a referral agreement with Firm. In so doing, the affiliated entity making the referral can receive referral fees from the Registrant. Clients are under no obligation to engage the services of such affiliated entities.

Argent Trust Company d/b/a Argent Trust Oklahoma, formerly d/b/a AmeriTrust Corporation and Heritage Trust Company

As previously stated, Argent Trust Company d/b/a/ Argent Trust Oklahoma and AmeriTrust Investment Advisors, Inc. are both wholly owned subsidiaries of Argent Financial Group. AmeriTrust Investment Advisors, Inc. is not operationally independent of Argent Trust Company d/b/a Argent Trust Oklahoma. The Firm has developed and implemented policies and procedures to minimize risks to client accounts. An independent auditing firm conducts an annual surprise examination to verify client funds and securities.

Also, certain of Argent Trust Company d/b/a Argent Trust Oklahoma employees may also be employed with AmeriTrust Investment Advisors, Inc.

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

Form ADV Part 2A, Item 11

AIA requires all employees to sign a Code of Ethics which includes commitment to placing the interest of clients above all else, acting in good faith with prudence and diligence, taking all reasonable measures to protect confidentiality, and compliance with applicable governmental laws and regulations. A copy of the Code of Ethics is available to clients and prospective clients, upon request.

Related persons may buy or sell for themselves securities that are purchased in discretionary portfolios. The Code requires that employees trading a security in personal accounts do so only after trading of that same security has been completed in client accounts, subject to certain exceptions. The exceptions include, without limitation, trading in U.S. government obligations, short-term debt securities, and exchange-traded and other open-end funds. All AIA employees are required to disclose their personal securities holdings on an annual basis, and securities transactions on a quarterly basis to the President of AIA.

AIA may periodically supplement or revise its Code in its discretion.

Brokerage Practices

Form ADV Part 2A, Item 12

Financial Planning Services. No arrangements to recommend brokers exist.

Investment Advisory Services. AmeriTrust Investment Advisors, Inc. assists the client in determining investment goals and structures investment portfolios designed to achieve those goals. The amount and types of securities to be purchased or sold and the selection of brokers and determinations of transaction costs paid are often decisions made without specific client consent. AIA seeks to allocate investment opportunities and securities to clients as fairly and equitably as possible in the particular circumstances of each trade.

Consistent with fiduciary obligations, AIA seeks best execution in all transactions. AIA defines best execution as the best price for a specific trade considering all relevant circumstances. AIA employees are expected to be mindful of their responsibility to seek best execution for our clients as part of their daily business activities and are encouraged to suggest any recommendations to firm management which may improve upon the best execution process. When possible, discounts on transaction costs are pursued. The Investment Committee will formally review trading and brokerage practices no less frequently than annually. A primary reason for this review is to improve upon AIA's best execution process.

AIA may select various entities for their ability to deliver quality execution and recordkeeping services, among other items. Firm may direct trades of a specific client through a particular broker when the broker has referred the client to Firm.

Resolution of Trade Errors

It is AIA's policy to ensure clients are made whole following a trade error. Specifically, should it be determined that AIA caused a trade error to occur in a client account that results in a loss, the client's account will be reimbursed. 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, or for some reason it is not permissible for the client to retain the gain, or we confer with the client and the client decides to forego the gain (e.g., due to tax reasons). If the gain does not remain in the client's account and Charles Schwab & Co., Inc. ("Schwab") is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. Generally, if related trade errors result in both gains and losses in the client's account, they may be netted.

Review of Accounts

Form ADV Part 2A, Item 13

Financial Planning Services. This Firm also provides broad-based financial planning services for its clients. The relationship with a client typically begins with an engagement for a written financial plan. After delivery of the plan, the client at his option may engage the subsequent services of the Firm to implement, review, and update the written financial plan at any interval the client selects. A particular case may be done as frequently as quarterly or monthly if the client desires, but not less frequently than annually. The review will be done by John Harvie Roe, CEO; Laurie Horton, Vice President; or Myles Linhares, Assistant Vice President. It will encompass a review of all factors included in the original plan and factors identified during implementation, including changes in the client's circumstances and goals, and factors added by changes in laws related to financial services provided.

Investment Advisory Services. Accounts will be reviewed with the frequency required by the account or market considerations. All accounts are reviewed at least annually by the Investment Committee. The Investment Committee is comprised of John Harvie Roe, CEO; Kenny L. Brown, Jr., President & COO; Ronald C. Dugan, Jr., Portfolio Manager, and Jaylon Rodriguez, Financial Associate; Mr. Dugan is responsible for preparing data on existing securities being managed and new securities being considered in the portfolios. The number of accounts assigned to each officer primarily depends upon the size and nature of the investments.

The account review process generally consists of the following steps and considerations:

- 1) Through discussions between the client and an officer, the investment objective is established for each client relationship. The typical investment objective is to produce investment performance that exceeds that of a specified market benchmark.
- 2) The investment team monitors each client investment to ensure that the investment is appropriate for the client's account.
- 3) If an investment is no longer appropriate, the portfolio manager assigned to the client relationship initiates the trading procedure which replaces that asset with a more suitable investment.
- 4) Continued monitoring of the client's portfolio is performed to ascertain whether the client's objectives are being met.
- 5) An officer assigned to the client relationship will meet with the client to evaluate whether the stated investment objective is being met and to discuss any factors which impact the achievement of the investment objective.
- 6) All accounts are subject to periodic reviews under provisions of the firm's compliance program developed in accordance with the Oklahoma Uniform Securities Act of 2004.

Financial Planning Services. The client may engage the Firm for review and updating of the original plan. This review and update will be supplied at intervals chosen by the client and will constitute the report regularly provided to clients. This report may or may not contain investment advice depending upon the assets of the particular client and the investment needs of the client.

Investment Advisory Services. Reports are sent to account holders at least annually. Most reports, however, are sent monthly with some sent quarterly. The report reviews market value, cash position, and transactions for the time period and asset allocation.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Investment Advisory Services.

Registered advisors with AmeriTrust Investment Advisors, Inc. may receive incentive compensation for new accounts opened by new or existing clients. No additional charges accrue to the client as a result of these incentive arrangements.

Firm may direct trades of a specific client through a particular broker when the broker has referred the client to Firm.

From May 2004 to August 2012, AmeriTrust Investment Advisors, Inc. ("AIA") received client referrals from Charles Schwab & Co., Inc. ("Schwab") through AIA's participation in Schwab Advisors Network ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with AIA. Schwab does not supervise AIA and has no responsibility for AIA's management of clients' portfolios or AIA's other advice or services. AIA continues to pay Schwab fees for the client referrals received through the Service during the period of participation.

For all accounts (both referred and non-referred) of AIA's clients maintained in custody at Schwab, Schwab does not charge the client separately for custody but receives compensation from AIA's clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also receives a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealers' fees. Thus, AIA may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. AIA, nevertheless, acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for AIA's other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

Custody

Form ADV Part 2A, Item 15

AmeriTrust Investment Advisors, Inc. (AIA) is not a qualified custodian. All client assets are under the control of the client's qualified custodian(s). Clients will receive account statements directly from their custodian at least quarterly. The statements will include all the activity in the account, plus a detailed list of all the client assets.

Each quarter, AIA provides clients with statements outlining the management fees assessed and encourages our clients to compare the account statements received from us to the statements they receive from the client's custodian for accuracy.

Each of our clients has separate contracts with their respective qualified custodians. The custodians have procedures in place to ensure AIA does not have the authority to obtain possession of client funds or assets; however, AIA has been given authority by the client to take management fees or financial planning fees from the accounts.

One of our affiliates, Argent Trust Company d/b/a Argent Trust Oklahoma, maintains assets for some of our clients who are also clients of that affiliate.

Investment Discretion

Form ADV Part 2A, Item 16

Financial Planning Services. As a financial planner, Firm does not make any determination regarding securities on behalf of client.

Investment Advisory Services. AIA typically has the authority to determine the securities and the quantity of securities to be bought or sold for its clients without obtaining specific client consent. AIA's discretionary authority regarding investments may be subject to certain limitations (e.g., restrictions or prohibitions placed by the client on transactions in certain types of securities or industries). Any such limitations are to be agreed upon in advance, in writing, with each client.

The process for accepting discretionary authority to manage securities accounts on behalf of clients includes meeting with the client to determine the level of service desired and then entering into an Agency Agreement that allows the Firm limited discretionary authority. Any exceptions to the authority requested by the client will be outlined either in the Agency Agreement or in the Investment Guidelines signed by the client and the Firm.

Voting Client Securities

Form ADV Part 2A, Item 17

Proxy Voting and Corporate Actions

Unless otherwise agreed by AIA and a client, AIA will typically vote proxies for voting securities held in client accounts. Proxies will be voted in the best interest of AIA's clients in accordance with AIA's then-current Proxy Voting Policy ("the Policy"). The decision of how to vote follows the same criteria AIA uses in managing client accounts - to vote for proposals in such a manner that, in AIA's opinion, will increase shareholder value. AIA will generally support management's recommendation on proxy issues, since management's ability is a key factor AIA considers in selecting equity securities for client portfolios. However, when AIA believes the company's management is acting in a manner inconsistent with our clients' best interest, AIA will vote against management's recommendations.

AIA may encounter a material conflict in voting client proxies. AIA has a duty to recognize a material conflict and to resolve the conflict before voting the proxy.

Should a client want to direct proxy voting other than outlined above, Firm would request written direction from the client. A client may make a written request to AIA for a record of the proxy voting on the securities in the client's account.

AIA will have no power, authority, responsibility, or obligation to take action with regard to any claim or potential claim in any bankruptcy proceeding class actions securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

AIA's policy is available, upon written request in hard copy form.

Financial Information

Form ADV Part 2A, Item 18

Firm does not receive fees more than six months in advance.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

J. Harvie Roe, CEO, is the manager of the firm. The President and Chief Operating Officer is Kenny L. Brown, Jr. Their formal education and business backgrounds are described in ADV Part 2B.

The firm is actively engaged in fee for service financial planning (approximately 30% of the business). This service is described in Item 4 of this brochure.

The firm does not base the calculation of fees on performance. Fees are based on assets under management.

There have been no arbitration claims or any civil or criminal proceedings involving the firm or any of its employees.

Neither the firm nor its management person has any relationship or arrangement with any issuer of securities.

Additional Information

None.

**John Harvie Roe
Laurie M. Horton
Kenny L. Brown, Jr.
Ronald C. Dugan, Jr.
Jaylon S. Rodriguez
Myles R. Linhares**

**AmeriTrust Investment Advisors, Inc.
4506 S Harvard Ave
Tulsa, Oklahoma 74135**

Phone: 918-610-8080

March 28, 2025

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about John Harvie Roe, Laurie M. Horton, Kenny L. Brown, Jr., Ronald C. Dugan, Jr., Jaylon S. Rodriguez, and Myles R. Linhares that supplements the brochure. You should have received a copy of that brochure. Please contact Kenny L. Brown, Jr., President, if you did not receive AmeriTrust Investment Advisors, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the above-named individuals is available on FINRA's website at <http://brokercheck.finra.org>.

Table of Contents

<i>Educational Background and Business Experience</i>	1
<i>Disciplinary Information</i>	5
<i>Other Business Activities</i>	6
<i>Additional Compensation</i>	7
<i>Supervision</i>	8
<i>Requirements for State-Registered Advisers</i>	9

Educational Background and Business Experience

Form ADV Part 2B, Item 2

John Harvie Roe

Year of Birth: 1949

Formal Education after High School:

Bachelor of Business Administration (BBA)-Finance: Oklahoma University, Norman, OK; 1971

Master of Business Administration (MBA); Southern Methodist University, Dallas, TX; 1975

National Graduate Trust School, Chicago, IL; 1991

Certified Financial Planner (CFP®); College for Financial Planning, Denver, CO; 1984

Business Background Last Five Years:

AmeriTrust Investment Advisors, Inc.; President & CEO 3/97-12/23; CEO 1/24-Present

Argent Trust Oklahoma, Tulsa f/k/a AmeriTrust Corporation; President & CEO 3/97-12/23; CEO 1/24-Present

Laurie M. Horton

Year of Birth: 1956

Formal Education after High School:

Bachelor of Science (BS)-Business; Indiana University, Bloomington, IN; 1979

Certified Public Accountant (CPA**); State of Indiana; 1985

Business Background Last Five Years:

AmeriTrust Investment Advisors, Inc.; Financial Analyst 11/02-12/05; Assistant Vice President 1/06-2/25;

Vice President 2/25-Present

Kenny L. Brown, Jr.

Year of Birth: 1985

Formal Education after High School:

Associate of Practical Theology; Christ for the Nations Institute, Dallas, TX; 2005

B.B.S., Magna Cum Laude; Dallas Baptist University, Dallas, TX; 2007

Master of Business Administration (MBA); Dallas Baptist University; Dallas, TX; 2009

Business Background Last Five Years:

AmeriTrust Investment Advisors, Inc; Sr. Vice President & COO 2/21-12/23;

President & COO 1/24-Present

AmeriTrust Investment Advisors, Inc.; Assistant Vice President/Portfolio Manager 09/17-1/21

Heritage Trust Company, Oklahoma City, OK; Vice President 01/15-07/17

Heritage Trust Company, Oklahoma City, OK; Portfolio Manager 07/13-12/14

Guidestone Financial Resources, Dallas, TX; Investment Analyst 08/12-06/13

Ronald C. Dugan, Jr.

Year of Birth: 1962

Formal Education after High School:

BBA Accounting; Texas A&M University, College Station, TX; 1982

MS Management Sciences; University of Texas at Dallas, Richardson, TX; 1991

Certified Public Accountant (CPA); 1987

Chartered Financial Analyst (CFA***); 1993

Business Background Last Five Years:

AmeriTrust Investment Advisors, Inc.; Portfolio Manager 12/20 to Present

Dugan Partners LLC, Allen TX; Owner and Consultant 09/16 to 12/20

Guidestone Financial Resources, Dallas, TX; Strategist/Chief Strategy Investment Officer 08/10-08/16

* See Page 3 for footnote

** See Page 4 for footnote

***See Page 4 for footnote

Myles R. Linhares

Year of Birth: 1989

Formal Education after High School:

Bachelor of Science in Personal Financial Planning (BS); Texas Tech University, Lubbock, TX; 2013

Business Background Last Five Years:

AmeriTrust Investment Advisors, Inc.; Financial Planning Analyst 07/21-2/25;

Assistant Vice President 2/25-Present

Unemployed; 04/2021-06/2021

Stonebridge Financial; Frisco, TX; Paraplanner 02/2020-03/2021

Bannerman Wealth; Dallas, TX; Client Service Associate 11/2018-01/2020

Unemployed; 06/2018-10/2018

Fidelity; Westlake, TX; Financial Representative 11/2015-05/2018

Jaylon Scott Rodriguez

Year of Birth: 1998

Formal Education after High School:

Bachelor of Business Administration in Finance (BBA); University of Oklahoma, Norman, OK; 2022

Business Background Last Five Years:

AmeriTrust Investment Advisors, Inc.; Financial Associate 12/2022-Present

*The CERTIFIED FINANCIAL PLANNER and CFP® marks are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning fields; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**The CPA is a license to provide accounting services to the public. A Certified Public Accountant (CPA) must meet education, work, and examination requirements including holding a bachelor's degree in business administration, finance, or accounting and completing 150 semester units of college education; two or more years of public accounting experience; and passing the Uniform CPA Exam. Continuing professional education (CPE) is also required to maintain licensure. In addition to the initial requirements for a Certified Public Accountant designation, forty hours of continuing education are required annually to maintain CPA status.

***A Chartered Financial Analyst (CFA) is a globally-recognized professional designation given by the CFA Institute that measures and certifies the competence and integrity of financial analysts. Candidates are required to pass three levels of exams covering areas such as accounting, economics, ethics, money management, and security analysis. Historically, the pass rates on each exam have been below 50%, making this series of tests one of the most difficult sets of financial certifications. A minimum of 300 hours of study is recommended for each exam.

Disciplinary Information

Form ADV Part 2B, Item 3

There have been no legal or disciplinary events for any of the supervised persons or the supervising person.

Other Business Activities

Form ADV Part 2B, Item 4

None.

Additional Compensation

Form ADV Part 2B, Item 5

Incentive bonuses may be awarded to supervised registered investment advisors who are directly involved in signing a new account. No additional charges accrue to the client as a result of these incentive arrangements.

Supervision

Form ADV Part 2B, Item 6

Mr. Brown, as President of the firm, supervises the associated persons listed in this narrative, with the exception of Mr. Dugan and Mr. Rodriguez who are supervised by Mr. Roe.

Mr. Brown convenes a meeting of the managers of the various areas four times each month. In addition, he presides over the Investment Committee which meets twice each month. He has significant involvement with existing clients, as well as prospects. Most client concerns are brought to the attention of Mr. Roe and/or Mr. Brown, and often they address them directly in communication with the client.

Requirements for State-Registered Advisers

Form ADV Part 2B, Item 7

Neither the supervised persons nor the supervising person have been involved in any arbitration claims involving an investment or investment-related business or activity; fraud, false statements or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Neither the supervised persons nor the supervising person have been found liable in any civil, self-regulatory organization, or administrative proceeding.