

Guardian Plus RS, Inc.

Retirement Services

4718 169th St. SE
Bothell, WA 98012
425.483.2169

Mailing Address:
PO Box 12248
Mill Creek, WA

guardianplus@frontier.com

www.the401khelper.com

Revised
November 10, 2014

This Brochure provides information about the qualifications and business practices of Guardian Plus RS, Inc. If you have any questions about the contents of this brochure, please contact us at (425) 483-2169 or email us at guardianplus@frontier.com. The information in this brochure has not been approved or verified by the United State Securities and Exchange Commission or by any state securities authority.

Additional information about Guardian Plus RS Inc. also is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 - Material Changes

- None

Item 3 - Table of Contents

Item 1 - Cover Page.....	cover
Item 2 - Material Changes.....	ii
Item 3 - Table of Contents	ii
Item 4 - Advisory Business	1
Item 5 - Fees and Compensation.....	2
Item 6 - Performance-Based Fees and Side-By-Side Management	2
Item 7 - Types of Clients.....	2
Item 8 - Methods of Analysis, Investment Strategies	2
and Risk of Loss	2
Item 9 - Disciplinary Information	3
Item 10 - Other Financial Industry Activities and Affiliations	3
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	4
Item 12 - Brokerage Practices.....	6
Item 13 - Review of Accounts	6
Item 14 - Client Referrals and Other Compensation	6
Item 15 - Custody.....	7
Item 16 - Investment Discretion.....	7
Item 17 - Voting Client Securities	7
Item 18 - Financial Information	7
Item 19 - Requirements for State-Registered Advisers	Error! Bookmark not defined.

Item 4 - Advisory Business

Asset Allocation

Individual 401(k) and Health Savings Accounts (HSA) recommendation services

Guardian Plus RS was founded 2014 and is 100% owned by Guardian Plus Inc. William H McElroy is the CEO of Guardian Plus RS Inc. and owns more than 80% of Guardian Plus Inc.

Guardian Plus RS provides asset allocation recommendations' on account assets within a client's 401(k) plan or for those that have investment choices in a Health Savings Account.

Personalized Asset Allocation – Guardian Plus will review your current investment choices and provide you with recommendations regarding investment selection, current portfolio allocation and suggested adjustments.

Unbiased recommendations. Guardian Plus RS is an independent Registered Investment Advisor. There is no affiliation with any security, broker-dealer, insurance, mutual fund or investment firms.

One low fee. \$19.95 per month

You are in control. Guardian Plus RS is not the custodian of your funds and does not have access to any accounts.

No sales calls. Guardian Plus RS will not try to sell you other products or investments.

Privacy. Clients' information is not shared, sold or distributed by anybody.

Fiduciary - Guardian Plus RS is a fiduciary by law and exercises the highest degree of care and utmost good faith in maintenance and preservation of client's assets and rights.

No Conflicts of Interest - Guardian Plus RS, Inc. is a fee only, Registered Investment Advisor thus removing the conflict of interest associated by commissions.

Guardian Plus RS five-part process:

1. Client Profile - Client develops their Investment Profile which outlines their goals and objectives, while taking into account risk tolerance level and unique needs and preferences/restrictions.
2. Investment Choices – The investment choices within a client's plan is reviewed. Guardian Plus RS categorizes the various investment choices.
3. Asset Allocation - Guardian Plus RS applies its current asset allocation to the investment choices. Then the asset allocation is customized to match the client profile.

4. Management – Periodic changes of the portfolio components and asset allocation as outlook for the market changes.
5. Review – In addition of on-time notifications when asset allocations are modified, clients receive monthly newsletters.

Experience - Our Director of Portfolio Management is William H McElroy, founder and CEO of Guardian Plus RS has over 37 years industry experience.

Item 5 - Fees and Compensation

Guardian Plus RS is a fee only firm and does not collect nor receive any commissions or referral fees paid by other products or service providers. Fees are paid by the client separately and not paid by the 401(k) or HAS plan.

Asset Allocation 401(k) services – (per account)
\$19.95 per month
No Minimum Account Size

Asset Allocation Health Savings Account – (per account)
\$19.95
No Minimum Account Size

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

Guardian Plus RS does not participate in Performance-Base fees or Side-By-Side management.

Item 7 - Types of Clients

Participants of 401(k) plans and Health Savings account

There is no minimum portfolio size that is required. (See Fee and Compensation section).

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

Methodology

One of the greatest contributions for our clients is asset allocation: determining how to maximize the return on investment while satisfying the client's risk tolerance. Asset allocation is an investment strategy that centers on altering investment proportions to take advantage of differences in expected performance of various asset classes. As an asset allocation strategy, the technique attempts to evaluate the expected performance of broad asset classes (such as stocks, bonds, and

cash), rather than predicting which individual securities are likely to outperform in the upcoming period.

The U.S. Securities and Exchange Commission states, “Asset allocation involves dividing an investment portfolio among different asset categories, such as stocks, bonds, and cash. The process of determining which mix of assets to hold in your portfolio is a very personal one. The asset allocation that works best for you at any given point in your life will depend largely on your time horizon and your ability to tolerate risk.

Risk versus Reward

When it comes to investing, risk and reward are inextricably entwined. You've probably heard the phrase "no pain, no gain" - those words come close to summing up the relationship between risk and reward. Don't let anyone tell you otherwise: All investments involve some degree of risk.

The reward for taking on risk is the potential for a greater investment return. If you have a financial goal with a long time horizon, you are likely to make more money by carefully investing in asset categories with greater risk, like stocks or bonds, rather than restricting your investments to assets with less risk, like cash equivalents. On the other hand, investing solely in cash investments may be appropriate for short-term financial goals.”

<http://www.sec.gov/investor/pubs/assetallocation.htm>

Guardian Plus RS evaluates the relative performance of investment choice with the 401(k), and then adjusts the exposure of the various investments to each of the various classes.

In making investment decisions we begin by establishing an investment profile for each client. The investment profile establishes the long-term proportions to be invested in each asset class. The investment profile must be suitable for the investor in terms of risk exposure and expected return. Risk is the possibility of an investment losing or not gaining value. Expected return is the percentage gain that an investment must produce for an investment to be made. Normally, an investment with low risk is an investment with a low return.

Once the proper asset allocation between has been established we monitor and adjust the various percentages in the various asset classes based on risk and expected returns.

Item 9 - Disciplinary Information

There are no legal or disciplinary events.

Item 10 - Other Financial Industry Activities and Affiliations

Guardian Plus RS is owned 100% by Guardian Plus Inc.

Guardian Plus Inc. was formed in 2005 and is a Fee Only Registered Investment Advisor.

Guardian Plus RS Inc., Guardian Plus Inc., nor any of its management persons have affiliations, registrations or registrations pending as a:

- Broker-dealer
Or a registered representative of a broker-dealer
- Futures Commission Merchant
- Commodity Pool Operator
- Commodity Trading Advisor
Or an associated person of the futures or commodities entities

Guardian Plus RS, Guardian Plus Inc., nor any of its management persons have any relationships of arrangement for the following:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker
- Investment company (including a mutual fund, closed-end investment company, unit investment trust, private investment company or an offshore fund)
- Other investment adviser or financial planner
- Futures commission merchant, commodity pool operator, or commodity trading advisor
- Banking or thrift institution
- Accountant or accounting firm
- Lawyer or law firm
- Insurance company or agency
- Pension consultant
- Real estate broker or dealer

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

Below are the Guardian Plus RS Fiduciary Duties and Code of Ethics, which is also available upon request:

Fiduciary Duties

In relationships with clients, employees shall use particular care in determining applicable fiduciary duty and shall comply with such duty as to those persons and interests to whom the duty is owed. Employees must act for the benefit of their clients and place their clients' interests before their own.

Employees shall:

- Act with integrity, competence, dignity, and in an ethical manner when dealing with the public, clients, prospects, employers and employees.
- Practice and encourage others to be active in a professional and ethical manner.
- Strive to maintain and improve their competence and the competence of others in the profession.
- Use reasonable care and exercise independent professional judgment.
- Maintain knowledge of and comply with all applicable laws, rules, and regulations of any government, governmental agency, regulatory organizations, licensing agency, or professional association governing the employees' activities.
- Not knowingly participate or assist in any violation of such laws, rules, or regulations.
- Not engage in any professional conduct involving dishonesty, fraud, deceit or misrepresentation or commit any act that reflects adversely on their honesty, trustworthiness, or professional competence.
- Inform their employer in writing, through their direct supervisor, that they are obligated to comply with the Code and Standards and are subject to disciplinary sanctions for violations thereof.
- Disclose to their employer all matters, including beneficial ownership of securities or other investment, which reasonably could be expected to interfere with their duty to their employer or ability to make unbiased and objective recommendations.
- Employees with supervisory responsibility, authority, or the ability to influence the conduct of others shall exercise reasonable supervision over those subject to their supervision or authority to prevent any violation of applicable statutes, regulation, or provision of the Code and Standards.

Code of Ethics

Employees shall:

- Exercise diligence and thoroughness in making investment recommendations or in taking investment actions.
- Have a reasonable and adequate basis, supported by appropriate research and investigation, for such recommendations or actions.
- Make reasonable and diligent efforts to avoid any material misrepresentation in any research report or investment recommendation.

- Use reasonable care and judgment to achieve and maintain independence and objectivity in making investment recommendations or taking investment action.
- Make a reasonable inquiry into a client's financial situation, investment experience, and investment objectives prior to making any investment recommendations and shall update this information as necessary.
- Consider the appropriateness and suitability of investment recommendations or actions for each client.
- Not make a recommendation unless they reasonably determine that the recommendation is suitable to the client's financial situation, investment experience, and investment objectives.
- Transactions for clients shall have priority over transactions for employees in securities or other investments.
- Preserve the confidentiality of information communicated by clients or prospects.
- Not make any statements, orally or in writing that misrepresents.
- Disclose to clients and prospects any consideration or benefit received by the employee.
- Not make any statements, orally or in writing that misrepresents the investment performance.

Employee Transaction

No employee of the firm may engage in personal securities transactions involving securities which are recommended of being bought or sold on behalf of clients until one trading day after such recommendation of buying or selling is completed.

Item 12 - Brokerage Practices

No brokerages, banks, insurance companies or other custodian firms are recommended by Guardian Plus RS, Inc.. Clients are responsible for using their company's retirement plan custodians.

Item 13 - Review of Accounts

Guardian Plus RS continuously reviews the investment choices within a client's 401(k) or HSA account. Clients will receive monthly information regarding their asset allocation along with market comments. Asset allocation recommendations will be delivered as changes are made.

All communication will be by email.

Item 14 - Client Referrals and Other Compensation

Not applicable

Item 15 - Custody

Guardian Plus RS does not hold or maintain custody of any clients' funds.

Item 16 - Investment Discretion

Guardian Plus RS does not have investment discretion.

Item 17 - Voting Client Securities

Guardian Plus RS does not vote proxies.

Item 18 - Financial Information

Since Guardian Plus RS does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, disclosing our balance sheet is not required.

Guardian Plus RS does not have any financial conditions that would impair its ability to meet contractual commitments to its clients.