



## **Disclosure Brochure**

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This brochure provides information about the qualifications and business practices of Financial Guidance Group, Inc. If you have any questions about the contents of this brochure, please contact us at (727) 787-7526 or [info@fgginc.com](mailto:info@fgginc.com). 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 Financial Guidance Group, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Material Changes**

Form ADV Part 2 ("Disclosure Brochure") requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated January 1, 2014, this new Disclosure Brochure dated January 1, 2015 was revised to include detailed information about wealth management planning and fees associated with wealth management. In addition, due to the increased amount of assets managed, Financial Guidance Group, Inc. is now under the jurisdiction of U.S. Securities and Exchange Commission.

Additional information about Financial Guidance Group, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

If you would like a complete copy of our brochure, we will provide it promptly and free of charge.

If you have any questions or would like a complete copy of our Disclosure Brochure, please contact Carl von dem Bussche, Sr., CFP®, AIF®, at (727) 787-7526 or [info@FGGinc.com](mailto:info@FGGinc.com).

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# Advisory Business

## *Our Background*

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Financial Guidance Group is an independent, fee-only investment advisor<sup>1</sup> offering objective, unbiased investment management and wealth planning, free from industry and product affiliations. We take our fiduciary responsibility seriously by choosing investments and strategies that place our clients' best interests first at all times.

"Fee only" describes how we are paid for our services. We are paid only by our clients, rather than by commissions and sales charges. What this means is that we work for the benefit of our clients, rather than for the benefit of a bank, brokerage company, mutual fund, insurance company or other financial product vendor. This approach removes compensation-related conflicts of interest and allows us to recommend whatever strategies and investments are appropriate for our clients' needs. Our clients trust us to care for their money as carefully as we care for our own, and we take this responsibility seriously. Your goals are our goals.

Our mission is to provide a superior level of coordinated, unbiased advice to help you achieve your financial goals, simplify your financial life and provide peace of mind through professional wealth management. As fee-only advisors, we are committed to serving as your fiduciary wealth management team. This means you can count on us to put your best interests first.

Financial Guidance Group is owned by and was founded in 1993 by Carl von dem Bussche, Sr., CFP®, AIF®. As of December 31, 2014, we managed approximately \$101,900,000 of client assets on a discretionary basis. We do not manage client assets on a non-discretionary basis.

## *Wealth Planning*

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Successful wealth planning is achieved by starting with a clear picture of your financial needs and objectives. The plans we develop helps us eliminate much of the guesswork in achieving the financial security and independence you desire by simplifying these financial alternatives. For you, such quality time invested by the Company on the front-end solves problems and provides solutions, eliminating future concerns and cultivates peace of mind.

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<sup>1</sup> Registration as an investment adviser does not imply a certain level of skill or training.

### *Financial Planning Composition*

Wealth planning is an evaluation of the investment and financial options available based upon your defined economic criteria and financial goals. Planning includes: (i) attempting to make optimal decisions; (ii) projecting the consequences of these decisions in the form of a financial plan – a working blueprint; (iii) implementing the protocol to achieve the objectives of the plan; and then, (iv) comparing future performance against the working blueprint.

A plan can be broad – a mutually defined review of your personal financial needs; or, segmented – review, analysis and evaluation of a core area of financial need. In general, planning encompasses one or more of the following areas of concern:

- **Personal** – Family records, budgeting, personal liability, estate information and financial goals.
- **Education** – Education IRAs, financial aid, State savings plans including 529 plans, grants and general assistance in preparing to meet dependents continuing educational needs through development of an education plan.
- **Taxes & Cash Flow** – Understanding the impact of various investments on your current income tax and future tax liability.
- **Death & Disability** – Cash needs at death, income needs of surviving dependents, estate planning and income analysis.
- **Estate** – Reviewing estate-planning documents, including wills and trusts, to determine if you should seek the assistance of an estate-planning attorney. Reviewing powers of attorney, nursing home and assisted living agreements, living trusts, and Medicare/Medicaid benefits.
- **Retirement** – Analysis of current strategies and investment plans to help you achieve retirement goals.
- **Investments** – Analysis of investment alternatives and their effect on your investment portfolio(s), including a risk and return analysis. Assessment of your risk tolerance profile.
- **Insurance** – Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.

### *Preparing the Plan*

We prepare the plan in three (3) stages. These stages are defined as follows:

## Stage 1 – Detailed Assessment

We learn about you and what you want to achieve through a detailed assessment process. This is accomplished through personal interviews and profile questionnaires<sup>2</sup>, which are designed to address all of the wealth planning disciplines discussed above. You have the opportunity to prioritize objectives and goals and to remove from the process any areas that are not applicable to your circumstances.

The time we invest in the detailed assessment process to listen to you is critical for developing a strong wealth planning foundation. Such time helps to:

- Define and narrow your goals, objectives and investment options;
- Stimulate creative thinking;
- Identify areas of greatest concern;
- Create a unique picture of your overall financial personality; and,
- Provide an effective and efficient way for us to address your unique financial needs and objectives.

After the interview process, we will prepare an agenda and meet with you to begin formally documenting goals and objectives. From this meeting, we will draft a report documenting the wealth planning process disciplines that you want to address and detailing the specific objectives under each discipline. Redrafting and meetings can be repeated until you are completely satisfied with the report. Depending upon the engagement, different levels of financial reporting will be undertaken. At a minimum, a statement of financial position, designed for wealth planning use only, will be prepared.

## Stage 2 – Personal Action Plan

We define the plan as a road map designed to take you from where you currently are financially to where you want to be financially. This is the creative portion of the process. There are usually many different ways to accomplish a given goal. The objective, however, is to formulate a plan that you will be comfortable executing. In some cases, the drafting of the plan reveals the need for us to help you reconcile the gap between expectations and financial realities. Once

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<sup>2</sup> The profile questionnaires are important tools in gathering information about your investment methodology, risk tolerance, income/tax bracket, liquidity, time horizons, etc. If you elect not to answer the questionnaires or choose to respond with limited input, it is possible that we could operate in a handicapped capacity. Therefore, if you want the most effective and accurate recommendations, you will make every effort to provide us with detailed personal needs and objectives, along with detailed financial and tax information.

a viable plan has been drafted, it is presented to and reviewed with you. The draft and review process may be repeated until you are satisfied with the plan.

### Stage 3 – On Target Reviews

A plan is of limited value if it is not put into action. Accordingly, we place a premium on implementing<sup>3</sup> and monitoring the plan. The implementation schedule provides a list of tasks and deadlines designed to ensure that you put the plan into action. The following are some examples of implementation: (i) drafting of appropriate estate documents (performed by an estate attorney); (ii) purchase of various insurance policies; (iii) investment advisory services, including preparation of a Client Investment Policy Statement and Profile and asset allocation strategy (performed by the Company, or another investment adviser/broker-dealer); (iv) adoption and monitoring of a personal budget; and, (v) ongoing income tax planning. We strongly suggest that you review the overall plan less than annually.

### *Investment Management*

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If you are satisfied with our recommendations, you may hire us as your professional manager to watch over your investments.<sup>4</sup> We will manage, monitor and report to you on your investments, endeavoring to meet your financial goals and objectives in a tax-efficient and risk-efficient manner.

When you hire us to manage your investments, you will give us discretion to select the specific securities and amount of securities to be bought or sold, as well as the timing of those transactions. At your option, you may impose specified investment constraints on the management of the assets you bring to us. For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of your portfolio or you may prohibit transactions in the securities of a specific industry. Such constraints can be detailed in writing, either via letter or in a custom Investment Policy Statement.

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<sup>3</sup> Implementing the recommendations made in a plan often requires consultation or coordination with one or more outside professionals (e.g. attorneys, CPAs, insurance and securities representatives). We will keep all information provided by you kept entirely confidential unless you authorize us to give your personal information to your outside professionals as well.

<sup>4</sup> You are not obligated to act on our recommendations or use our investment management services.

If one of your accounts is a plan subject to ERISA, you will appoint Financial Guidance Group as “Investment Adviser” for purposes of ERISA. We will need to have copies of plan documents and any amendments governing the operation and administration of those plan assets. We will not vote proxies for securities held in the plan. We ask that you take steps to name Financial Guidance Group as a fiduciary in the plan’s ERISA fidelity bond covering the account.

### *Portfolio Models*

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We have traditionally structured client portfolios around one of our four Model Portfolios designed to build long-term wealth while maintaining risk tolerance and loss thresholds levels acceptable to you.<sup>5</sup> Those models are listed below.



The Mainstay model is our conservative allocation. This portfolio is appropriate for investors who wish to preserve capital while providing for prudent growth and current income. Prospective investors include those nearing or in retirement or those who require immediate distributions or significant withdrawals within a three to five-year time frame.



The Steadfast portfolio is our balanced allocation. This portfolio is appropriate for investors who wish to grow assets in a prudent manner while providing some current income and capital preservation as secondary objectives. Prospective investors include those nearing or in retirement or those who require significant withdrawals within a five to ten-year time frame.



The Surveyor model is our enhanced-growth allocation. This portfolio is appropriate for investors who wish to grow assets with a minor emphasis on current income and capital preservation. Prospective investors include those who are 10+ years away from retirement and do not require significant withdrawals within a ten-year time frame.



The Explorer model is our risk-managed growth allocation. This portfolio is appropriate for investors who wish to grow assets with less concern for current income and capital preservation. Prospective investors include those who are 15+ years away from retirement and those who do not require significant withdrawals within 10 years.

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<sup>5</sup> The models may incorporate other investment vehicles used to achieve each model's investment objective.



The Model Portfolios have different “target” allocations among various asset classes, thus diversifying your investment dollars across a host of investments and spreading risks in a more prudent manner.

The investment mix is designed to achieve your desired investment return. Typically, the selected investment vehicles utilized in your portfolio will also be used across many other client accounts. From this point, the exact composition and allocation of your portfolio will be reflective of your unique investment parameters, with a resulting portfolio composition that is generally more complex in structure than those described by the four Model Portfolio strategies listed above.

### *Custom Portfolio, Other Strategies*

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Financial Guidance Group also manages portfolios on either a client-custom basis or utilizing a host of other techniques and model strategies not listed in the four model portfolios mentioned above. These other strategies include investment management via a mix of individual stocks and bonds, exchange-traded funds and no-load mutual funds. The client is free to choose a custom strategy, and strategy including all of the above, or a strategy that includes only a subset of the above.

## **Fees and Compensation<sup>6</sup>**

### *Wealth Planning*

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Our wealth planning fees are based on the size, complexity, and nature of your personal and financial situation and the amount of time it will take to analyze and summarize the plan and perform the services desired by you for the year.

#### *Comprehensive*

All comprehensive planning services are offered on a fixed fee basis and will range from \$3,000 to \$10,000 for the initial engagement.<sup>7</sup> The fee will be fully disclosed before you sign the Wealth Planning Contract (“Agreement”). This Agreement will include the cost<sup>8</sup> to review your financial information and prepare the comprehensive plan. One-half the fee will be due at the time the Agreement is signed, with the remaining half due upon completion.

#### *Targeted*

If you desire only targeted planning – review, analysis and evaluation of a core area of financial need – the fee will be billed at a rate not to exceed \$250.00 per hour with a four-hour minimum fee. All fees will be itemized in a billing statement to you, or as otherwise predetermined in a proposal, engagement letter and/or by retainer.

#### *Termination*

You will have five (5) business days to terminate the Agreement without charge. Should you wish to terminate the Agreement after such time and before presentation of the plan, we will be compensated through the date of termination for time spent in design of the plan at an hourly rate agreed to by both parties in the Agreement. After the plan has been completed and presented to you, termination of the Agreement is no longer an option.

### *Investment Management Fees*

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Financial Guidance Group provides a disciplined, risk-managed and tax-efficient portfolio management solution to all of our clients. Our standard fee structure presents the annual

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<sup>6</sup> Lower fees for comparable services may be available from other sources.

<sup>7</sup> Wealth planning fees are generally not negotiated. Investment management fees may be negotiated.

<sup>8</sup> Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract to perform a particular task and therefore will notify you of the additional cost prior to beginning such services.

percentage charged for portfolio management provided on an asset-based fee arrangement. The fee for a quarter is one fourth of the annual applicable percentages multiplied by the aggregate market value of the assets held in your account on the last regular trading day of each calendar quarter. The fee schedule is as follows:

<u>Annual AUM Fee</u>	<u>Quarterly AUM Fee</u>
<b>1.00%</b> on initial \$1,000,000	<b>0.25%</b>
<b>0.80%</b> from \$1,000,001 - \$3,000,000	<b>0.20%</b>
<b>0.60%</b> from \$3,000,001 - \$5,000,000	<b>0.15%</b>
Fees are negotiable above \$5,000,000	

Financial Guidance Group generally requires a minimum of \$500,000 in assets to begin management services.<sup>9</sup>

All accounts are subject to a \$250 minimum quarterly fee per client household that do not meet the above fee schedule, though we reserve the right to negotiate fees on a client-by-client basis.

Our clients are billed quarterly in advance, at one-fourth of the annual fee multiplied by the aggregate market value of the accounts on the last trading of the preceding calendar quarter. If the first period of investment management for a client's portfolio is less than one full quarter, the fee is pro-rated for that partial quarter.

You will provide written authorization to your custodian/brokerage firm to automatically deduct the fees from your account and send the fees to Financial Guidance Group. If your account does not have a sufficient cash or money market balance to cover the fees or is restricted from automatic debiting of fees, you may deposit additional funds (subject to certain restrictions for IRA accounts and qualified retirement plans) or make payment in an acceptable alternative manner. If you do not deposit additional funds or otherwise make the payment, securities in your account may be sold in an amount sufficient to cover the fees. Your account's custodian/brokerage firm will reflect the amount of the deduction on your account statement.

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<sup>9</sup>Fees and minimum account size may be negotiable on a client-to-client basis.

### *Deposits and Withdrawals*

You may make additions to your account at any time. Additional assets received in your account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the billing period.

For assets withdrawn by you, we have the option to refund management fees on a pro-rata basis. Withdrawals made by you may require modifications and adjustments to be made to your portfolio to correct your asset allocation.

### *Fee Exclusions*

Our fees do not include any charges imposed by third parties, such as custodian fees or mutual fund expenses. You may incur brokerage charges and other transaction costs.<sup>10</sup> See “*Brokerage Practices*” below for our discussion of brokerage firms.

### *Termination*

You have five (5) business days after entering into an agreement with us to cancel investment management services and not incur any fees charged by us. Thereafter, should you want to terminate investment services on a day other than the last day of a calendar quarter, the Company, at its discretion, may retain the unused portion of the quarterly management fee based on time, research and other expenses involved in the account set-up and implementation or you will be refunded a prorated share of the fees, if any, that have been prepaid for that quarter.

To terminate our investment management services, send a written notice to us at least 10 days prior to the actual termination date. Include in the notice clear instructions on what you want done with your account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity). Once we have received your termination notice and we have implemented your instructions, we are no longer responsible for the management of your portfolio.

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<sup>10</sup> Transaction fees may be reduced or waived at our discretion.

## Performance-Based Fees and Side-By-Side Management

We do not currently offer performance-based fee arrangements or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees for account management while at the same time managing accounts that are not charged performance-based fees.

## Types of Clients

### *Our Typical Clients*

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We serve a wide range of clients, from those just starting out to those preparing for, or already in retirement. We also work with companies to help them structure retirement plans and with non-profit organizations needing investment management services. FGG generally requires that clients have at least \$500,000 in assets to engage our portfolio management services, although we may make exceptions or reduce this minimum at our discretion.

### *Who We Serve*

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Our extensive experience in the wealth planning and investment management field has equipped us to be of the most benefit to:

- Individuals who want objective, fee-only advice that is not driven by commissions or sales fees
- People who want an organized, simplified and disciplined approach to their finances
- People who lack the time, knowledge, inclination, or temperament to go it alone in personal financial matters
- Those who want a second opinion on financial issues and investment portfolios
- Individuals who need anything from a coordinated plan to advice on a single financial matter

Our clients who are just starting out (Generation Y, born 1977- 2002), those who are pre-retirement (Generation X, born 1965-1976), and those who retiring or in retirement (Baby Boomers, born 1946-1964) and people who are responsible for their company's retirement plans. We help clients who serve as trustees or fiduciaries develop prudent plans for managing

assets. Whether you manage a family trust or charitable foundation, we can help you build the value safely with a focus on tax efficiency.

## **Methods of Analysis, Investment Strategies, and Risk of Loss**

### *Methods of Analysis*

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Our investment methodology is based on five premises devised from modern portfolio theory.

1. Clients are inherently risk-averse.
2. The markets are basically efficient.
3. Efficient portfolio risk management occurs mostly at the portfolio level, rather than at the individual security level.
4. For any level of portfolio risk that the client is willing to accept, there is a theoretical target rate of return that could be achieved.
5. A diversified portfolio relies on investments across multiple asset classes to obtain a higher risk-adjusted rate of return.

Accounts are managed in a disciplined and intelligent manner that focuses on asset valuation, an approach that helps us avoid the very common temptation to react emotionally to short-term market fluctuations. We use a fundamental approach that incorporates economic conditions, earnings, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, and interest rate levels, company management, debt ratios and tax benefits to make our allocation decisions.

We use analysis and research software developed by Morningstar® that provides insightful analysis, coordinated data, and tools for building and analyzing. Other sources include general media of domestic, international and governmental newspapers, bulletins, magazines, books and other publications. In addition we use material prepared by the investment companies and research releases prepared by others.

### *Investment Strategies*

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Generally, we recommend long-term investment strategies requiring a minimum three- to five-year time horizon.

## *Risk of Loss*

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Any investment in securities involves risk of loss that you should be prepared to bear, including the possibility that you may lose some or the entire principal amount invested. There is always a risk that investments may not perform successfully.

All securities have some risks in common. General risks can be categorized as market risk, company risk, and business risk. Risks can be further categorized, such as interest rate risk or sector risk. Specific types of securities may have more or less of each type of risk. For example, fixed income securities are affected by interest rate risk, credit risk, call (timing) risk, event risk, inflation risk, legal risk, sector risk, etc. as well as risk from external factors. An ETF investing in securities of an underlying index of fixed income securities will have similar risks as well as other risks, such as investment management strategy risk. Each asset class has its own risks associated with it and each portfolio has different risk and return characteristics.

We attempt to mitigate these risks through diversification across multiple asset classes, managing accounts with discipline and focus to resist the temptation to react to short-term market fluctuations.

## **Disciplinary Information**

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Financial Guidance Group or the integrity of our management. We have no information that applies to this item.

## **Other Financial Industry Activities and Affiliations**

We are required to disclose material relationships that we may have with related financial industry participants. In addition, we are required to disclose any conflicts of interest that these material relationships may create and provide you with information on how we address conflicts. We have no information that applies to this item.

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

Financial Guidance Group has adopted a formal Code of Ethics. This Code of Ethics includes requirements to make sure that we meet our fiduciary responsibilities:

1. We will put your interests before our interests.
2. You have the right to specify your investment objectives, guidelines, and/or conditions on the overall management of your account.
3. We will not make investment decisions for our personal portfolio(s) if the decision is based on information that is not also available to the investing public.
4. We will not participate in private placements or initial public offerings (IPO's) that we may recommend without disclosure to you.
5. We always make every effort to comply with all applicable federal and state regulations governing registered investment advisers.

On occasion, we may also buy or sell securities that we recommend to clients. This practice would create a conflict of interest if the transactions were designed to trade on the market impact caused by recommendations made to our clients. Our clients' transactions and our own transactions usually trade in sufficiently broad markets where these transactions will not have an appreciable impact on the securities' market value. Our Chief Compliance Officer reviews our personal transactions quarterly to make sure that our personal transactions are consistent with advice given to clients. The full text of our Code of Ethics is available to you on request.

## **Brokerage Practices**

### ***Custodial and Brokerage***

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The choice of custodian/brokerage firm for your account is always approved by you. Usually, we suggest Shareholders Service Group, Inc., which uses the custody and clearing services of Pershing, LLC. We suggest Shareholders Service Group because Shareholders Service Group specializes in meeting the unique servicing requirements of fee-only, independent registered investment advisors and their clients.

We do not recommend custodian or brokerage firms based solely on the lowest commission rates available. Trading capabilities, investment inventory, client investment needs, financial



strength, general reputation, and personal knowledge of each are considered as well as other items, in making the suggestion to use Shareholders Service Group over another.

We have arrangements with Shareholders Service Group to waive all charges for access based on total client assets under management. Shareholders Service Group provides custodial and brokerage services including on-line services for account administrative and operational support. On-line services include electronic trading, account forms and applications, trading authorization, accounting and reporting, and other relevant administration and support services.

Shareholders Service Group provides us with access to its institutional trading and operations services, which are typically not available to retail investors. These institutional services may include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors. Many of these services may be used to service all or a substantial number of our client accounts.

Shareholders Service Group is located at 9845 Erma Road, Suite 312, San Diego, CA 92131. Pershing, LLC is located at One Pershing Plaza, Jersey City, NJ 07399.

If you choose to direct us to use some other custodian/brokerage firm, it may cost you more. We may be unable to achieve the most favorable execution of your transactions because we may not be able to aggregate orders to reduce transaction costs or you may receive less favorable prices.

### ***Aggregated Orders***

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When we buy or sell the same security for two or more clients (including our personal accounts), we may place concurrent orders with Shareholders Service Group and/or other brokerage firms in order for trades to be executed in a single “block” trade at each brokerage firm. Where orders are aggregated, each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind as a result of the aggregation of client trades.

## **Review of Accounts**

Each account is reviewed by our Chief Executive Officer, Carl von dem Bussche, Sr., CFP®, AIF®, on an ongoing basis to ensure that your needs and objectives are being met. All accounts are reviewed in the context of your investment objectives and guidelines. Any adjustments needed are made as appropriate to your predefined guidelines and investment objectives. Cash needs will be adjusted as necessary.

We provide quarterly performance reports in addition to monthly or quarterly account statements provided by Shareholders Service Group or other custodians/brokerage firms.

## **Client Referrals and Other Compensation**

### *Additional Compensation*

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We may suggest the need for you to consult with an attorney, CPA, insurance agent or other professional. We do not share in any fees you pay to these professionals.

Some of the professionals that we recommend will refer their clients to us. As a result, this creates an incentive on our part to refer clients to only those professionals that send us referrals, rather than to someone who may provide better services at lower cost. To address this conflict, we want you to understand:

- Financial Guidance Group does not accept any economic benefit from referring clients to another professional without first notifying you of such possibilities. We act completely in a fiduciary capacity – putting your interests first.
- Financial Guidance Group is a fee-only investment advisor – no officer, director, or employee will receive commissions associated with the recommendations we make.
- You are under no obligation to use any professional we recommend to prepare planning documents (*i.e.*, estate, insurance, tax, etc.). You are free to choose anyone to implement our recommendations made in your financial plan.
- Certain professionals (insurance agents and brokerage firm representatives) may receive the commissions from purchases that you may make through their employer.

## ***Referral Compensation***

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We may pay individuals or organizations (i.e. solicitor) for client referrals, if they have entered into a written solicitation agreement with Financial Guidance Group. In these types of arrangements, we agree to pay the solicitor, dependent on the prospective client entering into an advisory agreement with us. Compensation to a solicitor generally functions as a percentage of our management fees. The solicitor is required to provide to the prospective client a written statement describing the compensation that will be paid. A solicitor is not permitted to offer investment advice on our behalf. Clients obtained through referrals will not pay higher fees than clients not obtained through referrals.

## **Custody**

All investments are held in your name and you have the right to withdraw any individual investment as well as to vote any investment shares held in your account. We do not intend to have custody of any of your funds or securities. This is a reason you will use an independently qualified custodian or brokerage firm to maintain your funds and securities.

You will not authorize us to withdraw or transfer any money, securities or property held in your account, except for the withdrawal of our advisory fees. We do not accept funds and securities on your behalf, nor do we issue instructions to your custodian for withdrawals of funds or securities without a written instruction from you for each withdrawal.

Periodically, you will receive account statements from your brokerage firm or custodian. You will also receive reports from us. We urge you to compare account statements you receive from your brokerage firm or custodian with these reports. Please let us know if there are any discrepancies.

## **Investment Discretion**

When we manage your portfolio, you will provide written authorization giving us discretion over the selection and amount of securities to be bought or sold, and the timing of transactions so that we will not ask for your consent or approval of each transaction. This investment authority may be subject to specified investment objectives and guidelines and/or conditions imposed by you, as described above in *"Advisory Business"*.

## **Voting Client Securities**

We do not accept authority to vote securities on your behalf. Your account custodian sends proxies or other solicitations about your securities directly to you. If you have questions about a particular solicitation, you can ask us for advice. You are not obligated to follow our advice on voting your securities.

## **Financial Information**

Financial Guidance Group is required to provide you with certain financial information or disclosure about its financial condition. Financial Guidance Group has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients nor has it been the subject of a bankruptcy proceeding.