



**Form ADV Part 2A  
Disclosure Brochure**

***Item 1 – Cover Page***

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March 19, 2018

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 [Hello@FGGinc.com](mailto:Hello@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.

Financial Guidance Group, Inc. is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Financial Guidance Group, Inc. is also available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

## ***Item 2 – Material Changes***

This Brochure dated March 19, 2018, represents the annual amendment to the Brochure for Financial Guidance Group, Inc.

Since the filing of the firm's annual update on March 24, 2017, subsequently amended September 1, 2017, we have made various updates to our Brochure but no other material changes were made.

Pursuant to regulatory requirements, we will deliver to you a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (727) 787-7526.

Additional information about the firm is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

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## **Item 4 – Advisory Business**

### *Our Background*

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Financial Guidance Group, Inc. (hereinafter “Financial Guidance Group,” “we,” “our,” or “us”) is an independent, fee-only investment advisor focused on 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 designed to place our clients’ best interests first.

“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 we believe are most appropriate for our clients’ needs. Our clients expect 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 financial peace of mind through professional wealth management. As fee-only advisors, we are committed to serving as your fiduciary wealth management team, striving always 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®. Please see **Brochure Supplement(s)**, Exhibit A, for more information on Mr. von dem Bussche and other individuals who formulate investment advice and have direct contact with clients or have discretionary authority over client accounts.

As of December 31, 2017, we managed approximately \$105,664,639 of client assets on a discretionary basis. We do not manage client assets on a non-discretionary basis.

### **SERVICES PROVIDED**

#### *Ongoing Investment Management and Guide Map Wealth Planning & Coaching Services*

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##### ***Investment Management Services***

As your professional manager, 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. Because we believe our investment management services are most effective when we understand your entire financial situation, we also provide ongoing customized wealth planning services (described further below) in conjunction with management of your portfolio. We typically structure client portfolios around one of our five model portfolios designed to build long-term wealth while maintaining

risk tolerance and loss thresholds levels acceptable to you. However, the exact composition and allocation of your portfolio will be reflective of your unique investment parameters. We also manage custom portfolios designed to meet your individual needs and preferences. More information about our investment methodology and model portfolios may be found in **Item 8**.

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, without prior consultation with you. 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 must be detailed in writing, either via letter or in a custom Investment Policy Statement. You should note, however, that certain restrictions may adversely affect the composition and performance of your investment portfolio. You should also note that your investment portfolio is treated individually by giving consideration to each purchase or sale for your account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ. Therefore, you should not expect that the composition or performance of your portfolio would necessarily be consistent with those of similar clients.

### ***Guide Map Wealth Planning and Coaching***

We believe our investment management services are most successful when we start out with a clear picture of your financial needs and objectives. That is why we include ongoing wealth planning advice along with our investment management services. For you, the quality time we invest on the front-end solving problems and providing solutions, can help alleviate future concerns and cultivate financial peace of mind.

The planning process begins by defining your current overall financial circumstances and long-term financial goals, objectives, and needs. Once this process has been implemented, we will design and propose a custom goals-based wealth plan using a specialized planning software.

Each plan will be based on the information you provide, and the complexity of your situation. A number of planning modules (see below) may be utilized to create a thorough plan that addresses your specific needs.

- Asset allocation review
- Asset allocation recommendations (i.e. Investment advice)
- Benefits planning
- Budgeting
- Cash management
- Cash flow analysis
- Clear projections and alternative scenarios
- College savings planning

- Custom designed portfolios
- Estate planning
- Funding plans, liquidity, and major expense assistance
- General financial planning
- Insurance review
- Legacy planning
- Long-term care review
- Miscellaneous services
- Ongoing financial education and guidance
- Retirement planning
- Risk management and insurance analysis
- Systematic Rebalancing
- Tax-efficiency evaluation
- Tax planning

Upon completion of your Guide Map plan, we will continue to maintain a dynamic real-time encrypted client portal for you. The client portal offers many important benefits, including:

- Ongoing 24/7 access to your wealth plan via a PC, tablet or Smartphone
- Aggregated real-time information for all your financial accounts
- Proprietary budgeting and expense tracking
- Interactive charts and customized analysis of your investments and wealth plan
- Secure access to your important documents in a digital vault via a client portal

The financial planning tools provided are an intrinsic part of the ongoing wealth planning services that we offer in conjunction with management of your investment portfolio.

Once your wealth management plan is completed, we will assist you with implementing the plan and will manage your investment portfolio on an ongoing basis. You should be aware that you are under no obligation to act upon any of the recommendations made by us in the plan or to engage the services of any recommended professional.

### *Standalone Wealth Planning*

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Financial Guidance Group will also provide comprehensive standalone wealth planning services for clients who may not require ongoing services. 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, standalone planning encompasses one or more of the areas set forth above in *Ongoing Wealth Planning*. We prepare the plan in three stages. In the first stage, we engage in a detailed assessment process with you to define and narrow your goals as well as create a unique picture of your overall financial personality. In the second stage, a road map is designed to help take you from your current financial position to obtaining your financial objectives. Finally, we prepare an

implementation schedule that includes a list of tasks and deadlines to assist you with putting the plan into action.

Although we may use financial planning software to assist us with constructing your wealth plan, our standalone planning services do not typically include ongoing access to any financial planning software or online client portals.

Once our planning advice is delivered, you may choose to have us implement your wealth plan and manage your investment portfolio on an ongoing basis. However, you are under no obligation to act upon any of the recommendations we make under a planning engagement and/or to engage us or the services of any recommended professional.

#### *Retirement Plan Advisory Services*

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We will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

Financial Guidance Group typically requires copies of Plan documents and any amendments governing the operation and administration of the Plan assets. We will not vote proxies for securities held in the Plan account(s). We also ask that you name Financial Guidance Group as a fiduciary in the Plan's ERISA fidelity bond covering the account(s).

The Employee Retirement Income Security Act of 1974 ("ERISA") sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, we will be considered a fiduciary under ERISA. For example, we will act as an ERISA § 3(21) fiduciary when providing non-discretionary investment advice to the Plan Fiduciaries by recommending a suite of investments as choices among which Plan Participants may select. Also, to the extent that the Plan Fiduciaries retain us to act as an investment manager within the meaning of ERISA § 3(38), we will provide discretionary investment management services to the Plan.

#### ***Fiduciary Consulting Services***

- **Investment Selection Services:** We will provide Plan Fiduciaries with recommendations of investment options and model portfolios consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).
- **Investment Monitoring:** We will assist in monitoring the plan's investment options by preparing periodic investment reports that document investment performance, consistency of fund

management and conformation to the guidelines set forth in the Investment Policy Statement and we will make recommendations to maintain or remove and replace investment options.

***Fiduciary Management Services***

- Discretionary Management Services: When retained as an investment manager within the meaning of ERISA § 3(38), we will provide continuous and ongoing supervision over the designated retirement plan assets. When applicable, we will have discretionary authority to make all decisions to buy, sell or hold securities, cash or other investments for the designated retirement plan assets in our sole discretion without first consulting with the Plan Fiduciaries.

***Non-Fiduciary Services***

- Participant Education and Enrollment: We will provide education services to Plan Participants about general investment principles and the investment alternatives available under the Plan. Plan Participants are responsible for implementing transactions in their own accounts. We will also assist with group enrollment meetings designed to increase Plan participation among employees.

With respect to any account for which Financial Guidance Group meets the definition of a fiduciary under Department of Labor rules, we acknowledge that both the firm and its Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between us.

## ***Item 5 – Fees and Compensation***

### ***General Fee Information***

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Fees paid to Financial Guidance Group are exclusive of all custodial and transaction costs paid to your custodian, brokers or other third party consultants. Please see ***Item 12 – Brokerage Practices*** for additional information. Fees paid to us are also separate and distinct from the fees and expenses charged by mutual funds, exchange traded funds (“ETFs”) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund’s prospectus or offering materials). You should review all fees charged by funds, brokers, Financial Guidance Group and others to fully understand the total amount of fees you pay for investment and financial-related services.

### ***Ongoing Wealth Planning and Investment Management Fees***

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Financial Guidance Group offers a disciplined, risk-managed and tax-efficient portfolio management solution to its clients. As noted above, ongoing wealth planning services are also provided in conjunction with management of your portfolio for one all-inclusive fee. Fees applicable to these services are based on a percentage of your assets under management (AUM), as follows:



<u>Annual AUM Fee</u>	<u>Quarterly AUM Fee</u>
<b>1.00%</b> \$150,000 - \$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	

Guide Map clients with less than \$150,000 of managed assets will pay a fixed monthly fee of a minimum of \$100.<sup>1</sup> Once the client's assets reach \$150,000, they will transition to the above AUM fee schedule.

We generally require clients 50 years of age or older to have an initial minimum portfolio size of \$500,000. Clients from 36 to 49 years of age are subject to a \$250,000 portfolio minimum. Clients, younger than 36, are not subject to any minimum portfolio requirement. We believe a graduated portfolio minimum allows younger clients with simpler financial lives to engage us at a reasonable fee, while recognizing that clients closer to retirement have more complex financial needs. All clients are subject to a \$300 minimum quarterly fee.

Financial Guidance Group may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where we deem it appropriate under the circumstances.

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

Included in your account paperwork is a written authorization to your custodian to automatically deduct the fees from your account and send the fees to Financial Guidance Group.<sup>2</sup> 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, securities in your account may be sold in an amount sufficient to cover the fees unless other payment arrangements are made. Your account's custodian will reflect the amount of the deduction on your account statement.

#### *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.

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<sup>1</sup> Note: Certain Guide Map clients may have the option to be billed monthly.

<sup>2</sup> Any alternative payment method must be agreed upon in writing in the Investment Advisory Agreement.

### *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, 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 have implemented your instructions, we are no longer responsible for the management of your portfolio.

### *Standalone Wealth Planning Fees*

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Our standalone wealth planning fees are based on the following: size, complexity, and nature of your personal and financial situation. The amount of time taken to analyze and summarize the plan as well as perform the services desired by you will also be considered.

#### *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>3</sup> The fee will be fully disclosed before you sign the Wealth Planning Contract ("Planning Agreement"). The Planning Agreement will include the cost<sup>4</sup> to review your financial information and prepare the comprehensive plan. One-half the fee will be due at the time the Planning 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 \$300 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 Planning Agreement without charge. Should you wish to terminate the Planning 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 Planning Agreement. After the plan has been completed and presented to you, termination of the Planning Agreement is no longer an option.

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<sup>3</sup> Standalone Wealth planning fees are generally not negotiated. Investment management fees may be negotiated.

<sup>4</sup> Rarely will a fee exceed those costs outlined in the Planning 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.

## *Retirement Plan Advisory Fees*

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Retirement plan advisory fees are individually negotiated with the Fiduciary(ies) of each Plan and may take the form of an asset-based, fixed and/or hourly fee arrangement. Factors considered when determining the fee may include, without limitation, the size of the Plan and number of Plan Participants, the scope and complexity of services to be provided, in addition to whether the selected services will be ongoing or periodic in nature. The Plan's specific fee arrangement will be detailed in the Plan's contract with Financial Guidance Group.

### ***Item 6 – Performance-Based Fees, 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.

### ***Item 7 – 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 as well as other fiduciaries needing investment management and consulting services.

We generally require that clients 50+ years of age have at least \$500,000 in assets to engage us for portfolio management services. For clients 36 to 49 years of age, \$250,000 is the minimum required portfolio. For clients under 35 or younger, there is no minimum portfolio. The minimum quarterly fee per client portfolio is \$300. We may make exceptions or reduce these minimums at our discretion.

#### *Who We Serve*

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As long-time practitioners in the wealth planning and investment management fields, we believe we are well-equipped 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 are those 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 prudently with a focus on tax efficiency.

## ***Item 8 – 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.

We are committed to managing accounts in a disciplined and intelligent manner that focuses on asset valuation. This approach 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, interest rate levels, company management, debt ratios and tax benefits to make our allocation decisions.

Mutual funds or ETFs are generally evaluated and selected based on a variety of factors as applicable and without limitation, including: past performance, fee structure, fund manager, fund sponsor, and overall ratings for safety and returns.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. We will generally evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

We use analysis and research software developed by Morningstar<sup>®</sup> 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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#### *Portfolio Models*

Generally, we recommend long-term investment strategies requiring a minimum three- to five-year time horizon. We typically structure client portfolios around one of our five Model Portfolios designed to build long-term wealth while maintaining risk tolerance and loss thresholds levels acceptable to you. Model portfolios are primarily comprised of exchange traded funds (“ETFs”) and to a lesser extent, mutual funds, bonds and stocks. 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 model 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.



The Harvest model is designed for income-oriented investors. This portfolio places emphasis on current income from dividends and interest with less concern for capital appreciation. The portfolio is diversified among low-cost ETFs that are comprised of dividend U.S. stocks, preferred stocks, international dividend stocks and preferred stocks, U.S. core bonds, real estate investment trusts ("REITs") and energy related master limited partnerships ("MLPs"). The Portfolio seeks to provide between a 2.5% to 3.5% current return with the opportunity for some capital appreciation.

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. However, 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 five model portfolio strategies listed above.

#### *Custom Portfolio, Other Strategies*

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 five model portfolios mentioned above. These other strategies include investment management via a mix of individual stocks and bonds, ETFs and no-load mutual funds. The client is free to choose a custom strategy, a strategy including all of the above, or a strategy that includes only a subset of the above.

#### *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. We attempt to mitigate risk through diversification across multiple asset classes, striving to manage accounts with discipline and focus to resist the temptation to react to short-term market fluctuations. However, diversification does not guarantee investment returns and does not eliminate loss. There is always a risk that investments may not perform successfully.

**Management Risks.** While Financial Guidance Group manages client investment portfolios based on our experience, research and proprietary methods, the value of client investment portfolios will change

daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that we allocate client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, we may invest client portfolios in mutual funds, ETFs and other investment pools (“pooled investment funds”). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds’ success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Equity Market Risks.* We will generally invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security’s prospects.

*Fixed Income Risks.* We may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* We may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security’s underlying foreign currency.

### ***Item 9 – 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.

### ***Item 10 – 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.

### ***Item 11 – Code of Ethics, Participation or Interest in Client Transactions, Personal Trading***

#### ***Code of Ethics and Personal Trading***

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Financial Guidance Group has adopted a Code of Ethics (“the Code”), the full text of which is available to you upon request. Our Code has several goals. First, the Code is designed to assist us in complying with applicable laws and regulations governing our investment advisory business. Under the Investment Advisers Act of 1940, we owe fiduciary duties to our clients. Pursuant to these fiduciary duties, the Code requires persons associated with us (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Financial Guidance Group’s associated persons. Under the Code’s Professional Standards, we expect our associated persons to put the interests of our clients first, ahead of personal interests. In this regard, our associated persons are not to take inappropriate advantage of their positions in relation to our clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time our associated persons may invest in the same securities recommended to clients. Under our Code, we have adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code’s personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.



### *Participation or Interest in Client Transactions*

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As outlined above, Financial Guidance Group has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, our goal is to place client interests first.

Consistent with the foregoing, we maintain policies regarding participation in initial public offerings (“IPOs”) and private placements to comply with applicable laws and avoid conflicts with client transactions. If an associated person of Financial Guidance Group wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person’s shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with our written policy.

## **Item 12 – Brokerage Practices**

### *Custodial and Brokerage*

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When given discretion to select the brokerage firm that will execute orders in client accounts, Financial Guidance Group seeks “best execution” for client trades which is a combination of a number of factors, including (without limitation): quality of execution, services provided and commission rates. Recognizing these various factors, we may use or recommend using brokers who do not necessarily charge the lowest available commission. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Financial Guidance Group recommends that clients establish brokerage accounts with Shareholders Service Group, Inc. (“SSG”), which uses the custody and clearing services of Pershing, LLC, a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of clients’ assets. Financial Guidance Group will also place trades for client accounts at SSG, or may in some instances, consistent with Financial Guidance Group’s duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although we may recommend that clients establish accounts at SSG, it is ultimately the client’s decision to custody assets with SSG. Financial Guidance Group is independently owned and operated and is not affiliated with SSG. SSG does not supervise Financial Guidance Group, its agents or activities.

SSG provides us with access to its institutional trading, custody, reporting and related services, which are typically not available to SSG’s retail investors. SSG also makes available various support services. Some

of those services help us manage or administer our clients' accounts; while others help us manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform offered by SSG. SSG's brokerage services include executing security transactions, as well as providing custody and research. In addition, we receive access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Financial Guidance Group client accounts maintained in their custody, SSG generally does not charge separately for custody services, but are instead compensated by account holders. This compensation may be acquired through commissions and other transaction-related or asset-based fees for securities trades, which are executed through SSG or settle into SSG's accounts. SSG also makes available to Financial Guidance Group other products and services that benefit us, but that may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our accounts, including accounts not maintained at SSG.

SSG's products and services that assist us in managing and administering clients' accounts include software and other technology that:

- (i) provide access to client account data (such as trade confirmations and account statements)
- (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- (iii) provide pricing and other market data
- (iv) facilitate payment of Financial Guidance Group's fees from its clients' accounts
- (v) assist with back-office functions, recordkeeping and client reporting

SSG also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- (i) technology, compliance, legal, and business consulting
- (ii) publications and conferences on practice management and business succession
- (iii) access to employee benefits providers, human capital consultants and insurance providers

SSG may make available, arrange and/or pay third-party vendors for the types of services rendered to us. SSG may discount or waive fees they would otherwise charge for some of these services, or they may pay all or a part of the fees of a third-party providing these services to us. SSG may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that clients custody their assets at SSG, Financial Guidance Group may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by SSG, which may create a potential conflict of interest.

### *Directed Brokerage*

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Clients may direct Financial Guidance Group to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that we have with SSG is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Financial Guidance Group to use a specific broker or dealer, clients who are subject to ERISA confirm and agree that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

### *Aggregated Orders*

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Financial Guidance Group typically directs trading in individual client accounts when trades are appropriate based on the client's investment plan, without regard to activity in other client accounts. However, from time to time, we may aggregate trades together for multiple client accounts. This most often occurs when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, we will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis providing that any participating accounts that are owned by Financial Guidance Group or its officers, directors, or employees will be excluded first.

## ***Item 13 – Review of Accounts***

Managed portfolios are reviewed at least quarterly. However, they may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Financial Guidance Group. These factors

generally include, but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement) as well as economic, political or market conditions. Each account is reviewed by our Chief Executive Officer, Carl von dem Bussche, Sr., CFP®, AIF®, or Christoph von dem Bussche, CFP®, who serves as both our Chief Operating Officer and Chief Compliance Officer, to help ensure that your needs and objectives are being met. Any adjustments needed are made as appropriate to your predefined guidelines and investment objectives. Cash needs will also be adjusted as necessary.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, we provide a quarterly report for each managed portfolio. This written report normally includes a summary of portfolio holdings, performance results, and statement of fees. Additional reports are available upon your request.

## ***Item 14 – Client Referrals and Other Compensation***

### ***Additional Compensation***

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As noted above, Financial Guidance Group receives an economic benefit from SSG in the form of support products and services it makes available to us and other independent investment advisors whose clients maintain accounts at SSG. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of SSG's products and services is based solely on our participation in its programs and not in the provision of any particular investment advice.

### ***Recommendation of Other Professionals***

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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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Financial Guidance Group may pay individuals or organizations (i.e. solicitors) for client referrals, if they have entered into a written solicitation agreement with us. 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.

#### ***Item 15 – Custody***

SSG is the custodian of nearly all client accounts at Financial Guidance Group. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with Financial Guidance Group's agreement with each client, we will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times, there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

#### ***Item 16 - Investment Discretion***

As described above under ***Item 4 - Advisory Business***, Financial Guidance Group manages portfolios on a discretionary basis. This means that after an investment portfolio is developed for you, we will implement the portfolio without specific consent from you for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving us the authority to carry out various activities in the account, generally including the following: trade execution, the ability to request checks on behalf of the client, and the withdrawal of advisory fees directly from the account. We then direct investment of your portfolio using our discretionary authority. You may limit the terms of the LPOA to the extent consistent with your advisory agreement with us and the requirements of your account custodian. Our discretionary relationship is further described in our agreement with you.

### ***Item 17 – 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.

### ***Item 18 – Financial Information***

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