

Form ADV**Disclosure Brochure for Investment Advisers****Part 2A-Page 1**

Name of Investment Adviser: New England Guild Wealth Advisors, Inc.

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Date of Brochure: March 6, 2018

This brochure provides information about the qualifications and business practices of New England Guild Wealth Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at (860) 404-5900. 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.

(Item 2) None

Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
1	Cover Page	1
2	Material Changes	1
3	Table of Contents	1
4a	Advisory Business-Principal Owners	2
4b	Advisory Business- Types of Advisory Services	2
4c	Advisory Business- Individual Needs of Clients	2
4d	Advisory Business- Wrap Fee Programs	2
4e	Advisory Business- Assets under Management	2
5a	Fees and Compensation-Fee Schedules	2
5b	Fees and Compensation- Deduction of Fees	3
5c	Fees and Compensation- Other Fees and Expenses	3
5d	Fees and Compensation- Prepaid Fees	3
5e	Fees and Compensation- Sale of Securities	3
6	Performance-Based Fees and Side-by-Side Management ..	3
7	Types of Clients	3
8a	Methods of Analysis, Investment Strategies and Risk of Loss-General Description	3
8b	Methods of Analysis, Investment Strategies and Risk of Loss- Material Risks for Investment Strategies	4
9	Disciplinary Information	4
10a,b,c,d	Other Financial Industry Activities and Affiliations	4
11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	4
12	Brokerage Practices	5
12a1	Brokerage Practices-Soft Dollars	7
12a2	Brokerage Practices- Client Referrals	8
12a3	Brokerage Practices- Directed Brokerage	8
12b	Brokerage Practices- Aggregation	8
13a,b,c	Review of Accounts	9
14a,b	Client Referrals and Other Compensation	9
15	Custody	9
16	Investment Discretion	10
17	Voting Client Securities	10
18a,b,c	Financial Information	10

4a. (Principal Owners)

New England Guild Wealth Advisors, Inc. ("Guild") began its business as an investment adviser in 1991 by providing investment advisory services to individuals, families, retirement plans, trusts and endowments, on both a discretionary and a non-discretionary basis. There are two owners of the Guild: E. Patrick Logue, and Susan M. Grayson.

4b. (Types of Advisory Services)

Our advisory services include a review of a client's financial position, development of investment objectives, and design and implementation of an investment program customized for that client. We utilize investment types including open-end and closed-end mutual funds, individual stocks and bonds, and Exchange Traded Funds (ETFs). We also advise our clients about Investment Company Act securities including variable life insurance separate accounts, variable annuity separate accounts and mutual funds.

4c. (Individual Needs of Clients)

We customize our advice to fit client-identified needs by conducting a review of the client's financial position, developing investment objectives agreed to by the client which meet the client's future need for cash, and then designing and implementing an investment program for the client.

4d. (Wrap Fee Programs)

Not applicable.

4e. (Assets Under Management)

As of December 31, 2017 we managed a total of \$393.5 million of client assets.

5a. (Fees and Compensation-Fee Schedules)

We charge an asset-based fee for advisory services based upon assets under management. This is a separate fee from any fees charged by unaffiliated investment managers. This fee does not include any fees or costs which may be charged by a brokerage firm or custodian selected by the client to execute transactions. Our asset-based fee will generally be based on the following schedule:

First \$1,000,000	1.00% (Annually)
Next \$2,000,000	0.75%
Next \$2,000,000	0.50%
Over \$5,000,000	0.25%

New England Guild Wealth Advisors, Inc. in its sole discretion may charge a different advisory fee based upon certain criteria (including, but not limited to, anticipated additional assets, related accounts, account composition, or negotiations with client).

5b. (Fees and Compensation-Deduction of Fees)

Fees are payable quarterly in advance based on the market value of the managed assets on the last day of the preceding quarter. Clients may elect to have these fees deducted from one or more of their managed accounts or they may elect to pay their bill by check.

5c. (Fees and Compensation-Other Fees and Expenses)

As noted in 5a above, our clients may incur other fees and expenses charged by brokers, fund managers, and custodians utilized in the management of their investments.

5d. (Fees and Compensation-Prepaid Fees)

Our clients are billed in advance for our fees. If the advisory contract is terminated for any reason before the end of the billing period we will refund that portion that has been prepaid but has not yet been used on a pro-rata basis.

5e. (Fees and Compensation-Sale of Securities)

Our Firm does not, nor do our employees, receive compensation for the sale of securities or any other investment products.

6. (Performance-Based Fees and Side-by-Side Management)

Our Firm does not, nor do our employees, receive performance-based fees.

7. (Types of Clients)

Most of the clients of the Guild are individuals and families. We also have a small number of clients that are Trusts, Foundations, and Endowments. We reserve the right, in our sole discretion, to charge a different investment management fee based upon certain criteria (including, but not limited to, anticipated additional assets, related accounts, account composition, or negotiations with client).

8a. (Methods of Analysis, Investment Strategies and Risk of Loss-General Description)

Almost all of the New England Guild Wealth Advisors' business involves giving advice to clients to help them meet their future needs for cash. This is done by analyzing the client's resources and projected needs in the beginning of a relationship. We then recommend asset allocation targets designed to meet a client's future needs for cash. The resulting investment policy is then implemented using diversification as the primary process. To help achieve this diversification, we utilize open-end mutual funds broadly in client portfolios to meet the client's asset allocation targets and to mitigate investment risk. Other investment vehicles used include Exchange Traded Funds and closed-end mutual funds. Individual stocks and bonds are rarely purchased or sold in client accounts, and when they are traded, usually it is at the client's direction. In all of our investment strategies we strive to explain to clients that investing in securities involves risk of loss that our clients should be prepared to bear.

8b. (Methods of Analysis, Investment Strategies and Risk of Loss-Material Risks for Investment Strategies)

We analyze industry data available to the public using analytical tools as a way of selecting the particular investment vehicle or vehicles recommended for a client. We believe that many small risks are preferable to a few large risks. Therefore, we believe in broad-based diversification within and across capital markets. This may include investments in less traditional asset classes that offer the potential to improve the portfolio's risk/return relationship by reducing asset class correlation.

9. (Disciplinary Information)

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of New England Guild Wealth Advisors, Inc.'s advisory business or the integrity of our management.

10a and b. (Other Financial Industry Activities and Affiliations)

Neither our firm nor any of our employees are registered, nor have an application pending to register, with any other organization such as broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or other similar organizations.

10c. (Other Financial Industry Activities and Affiliations)

New England Guild Wealth Advisors, Inc. has no relationship or arrangement with any other firm that is material to our advisory business. None of our employees have relationships or arrangements with any other firm that is material to our advisory business.

10d. (Other Financial Industry Activities and Affiliations)

We do not recommend, nor do we select, other investment advisers for our clients where we would receive any compensation directly or indirectly that would create a material conflict of interest.

11. (Code of Ethics, Participation or Interest in Client Transactions and Personal Trading)

Our firm has implemented an investment policy relative to personal securities transactions as part of its Code of Ethics. The Code of Ethics serves to establish a standard of business conduct for all of our employees that is based upon fundamental principles of openness, integrity, honesty and trust. A copy is available upon request. In addition, we also maintain and enforce written policies designed to prevent the misuse of material non-public information by our firm or any person associated with our firm.

We allow our employees to maintain personal securities accounts as long as any personal investing by an employee in any accounts in which the employee has a beneficial interest is consistent with the Code of Ethics. It is our intent to avoid any conflict of interest, or appearance of conflict of interest, between trades undertaken for family and personal accounts, and clients of the Guild. Consequently, client trades will

always have priority over trades for family and personal accounts. While trades in open-end mutual funds may be undertaken simultaneously for clients and family and personal accounts, no trades in individual securities should occur in family or personal accounts on the same day as a trade is undertaken in a client account. If a trade occurs in a family or personal account before it is known that a client trade in that same security is to be executed, an explanation of the timing and background of the trade will be prepared by the client's advisor. All family and personal accounts are organized within a single master account, distinct from client master accounts. All trades including Family and Personal Account trades of individual securities are executed by the Investment Operations Manager, Principal or Investment Advisor. Family and personal trades are reviewed to ensure the securities being traded have not already been traded in client accounts that day. If the securities have been traded in a client account that day, the requested personal or family trade is not executed until a following day. Furthermore, the transaction ledger is reviewed daily for related trades in client and personal accounts. If related transactions are found, the Chief Compliance Officer is notified and investigates the reason for the same day trades.

The Compliance Officer reviews all employees' reports of personal securities transactions for compliance with the firm's policies, including the Insider Trading Policy, regulatory requirements and the firm's fiduciary duty to its clients, among other things.

12. (Brokerage Practices)

New England Guild Wealth Advisors, Inc. does not maintain custody of your assets that we manage (although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them.

Prior to engaging us to provide investment management services, the client will be required to enter into a formal Advisory Agreement with us setting forth the terms and conditions under which we shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Currently, we recommend that clients primarily allocate investment management assets among various individual equity and/or fixed income securities, mutual funds and/or independent investment managers or programs, on a discretionary or non-discretionary basis, in accordance with the client's designated investment objective(s). As discussed above, unless the client directs otherwise, we shall generally recommend that Schwab serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds; and, commissions are charged for ETF, individual equity and fixed income securities transactions).

In addition to the Guild's advisory fee and Schwab's brokerage commissions and/or transaction fees, the client will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Both the Guild's Advisory Agreement and the custodial/ clearing agreement may authorize the custodian to debit the client's account for the amount of our investment advisory fee and to directly remit that management fee to us in compliance with regulatory procedures. The Advisory Agreement between the Guild and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Advisory Agreement. Upon termination, the Guild shall provide a pro-rata refund of advanced fees paid.

Factors that we consider in recommending Schwab (or any other broker-dealer/custodian to clients) who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior relationship and service to us and our other clients
- availability of other products and services that benefit us, as discussed below.

Although the commissions and/or transaction fees paid by our clients shall comply with our duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, our investment management fee. Our best execution responsibility is qualified if securities that we

purchase for client accounts are no-load mutual funds that trade at net asset value as determined at the daily market close.

12a1. (Brokerage Practices-Soft Dollars)

The Guild does not utilize research, research-related products and other services obtained from broker-dealers, or third-parties, on a soft dollar commission basis.

We may, however, recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. New England Guild Wealth Advisors, Inc. is independently owned and operated and not affiliated with Schwab.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab 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.

Here is a more detailed description of Schwab's support services:

Services that Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as educational events and occasional business entertainment of our personnel.

Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. In evaluating whether to recommend that clients custody their assets at Schwab, we 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 we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

12a.2. (Brokerage Practices-Client Referrals)

The Guild does not receive client referrals from Charles Schwab & Co., Inc. ("Schwab"), or from any other source for which we pay for those referrals.

12a.3 (Brokerage Practices-Directed Brokerage)

The Guild does not recommend, request or require that a client direct us to execute transactions through a specified broker-dealer. Furthermore, it is our practice to not accept client instructions for directing their brokerage transactions to a particular broker-dealer.

12b. (Brokerage Practices-Aggregation)

The aggregation or blocking of client transactions allows us to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to clients. Our firm's policy is to aggregate client transactions where possible and when advantageous to clients. In these instances, clients participating in any aggregated transactions will receive an average share price. Accounts of our employees may not be included in block trades involving client accounts. Trades for our employees may not occur on the day of the completion of a block trade.

13a and b. (Review of Accounts)

Clients for whom we provide advisory services receive account reviews on a periodic basis, usually quarterly, conducted by our Principals and/or Advisors who have responsibility for client relationship management. Our investment advisory clients are advised that it remains their responsibility to advise the Guild of any changes in their investment objectives and/or financial situation. Clients are encouraged (in person, via email, or via telephone) to comprehensively review investment objectives and account performance with the Guild on an annual basis.

13c. (Review of Accounts)

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Those clients to whom we provide advisory services shall also receive periodic reports (usually quarterly) from us summarizing account holdings and performance.

14a and b. (Client Referrals and Other Compensation)

The Guild recommends no load mutual funds & ETFs to our clients based on our analysis of risk-adjusted performance of the funds. We are not compensated directly or indirectly by the mutual fund companies.

We offer financial advisory services to clients referred to us by existing clients and by law, accounting, and pension advisory firms. There are no referral fees paid by us for these arrangements.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

15. (Custody)

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to the periodic [account statements/portfolio reports] you will receive from us.

Under rule 206(4)-(2) of the Investment Advisors Act of 1940 New England Guild Wealth Advisors, Inc. is deemed to have custody of client assets. An adviser has custody if it or its related person holds, directly or indirectly, client funds or securities or has any authority to obtain possession of them. For example, we may at our discretion

serve as a trustee for a client trust or have full access to a client account for which we are able to transfer funds to accounts other than those registered to the client. These two types of responsibilities would give us custody. As a result we are required to take the steps listed below to ensure the safekeeping of client assets.

- Use of “qualified custodians” to hold client assets. An adviser with custody generally must maintain client funds and securities at a qualified custodian (e.g., a bank or a broker-dealer), either in a separate account for the client under the client’s name or in an account under the adviser’s name as agent or trustee for the adviser’s clients that contains only client assets (i.e., client assets may not be commingled with the adviser’s assets). All New England Guild Wealth Advisor, Inc. accounts are held by a qualified custodian.
- As required under the rules, the qualified custodians we use send notices to clients detailing how their assets are being held.
- As required, the qualified custodians we use send account statements to our clients at least quarterly.
- Annual surprise exams. Advisers that have custody of client assets in many cases must undergo an annual surprise examination by an independent public accountant that verifies client funds and securities. We have engaged a qualified CPA firm to conduct such surprise exams.

16. (Investment Discretion)

Client assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold our clients’ assets in a brokerage account and buy and sell securities when they or we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Many of our clients give us discretionary authority to manage securities accounts on their behalf. This authority is expressed in the new account agreement with Schwab. Some clients wish us to manage their investments but do not give us authority to manage the securities accounts. In these cases (non-discretionary) we will not be able to assist in the activity of buying and selling securities.

17. (Voting Client Securities)

As a matter of policy New England Guild Wealth Advisors, Inc. does not vote proxies on the behalf of clients.

18a. (Financial Information)

We do not require or solicit prepayment of fees from any client six months or more in advance, so no response is required under the rules for this section of the Brochure.

18b. (Financial Information)

There are no financial conditions that are reasonably likely to impair our ability to meet contractual commitments to clients.

18c. (Financial Information)

Our firm has not been the subject of a bankruptcy petition at any time.