

FORM ADV PART 2 - Brochure



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This brochure provides information about the qualifications and business practices of Guardian Wealth Management, Inc. If you have any questions about the contents of this brochure, please contact us at 309-692-1460 or info@gwmanagers.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. Registration does not imply a certain level of skill or training.

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

Material Changes

Since the last one was published and distributed to clients on March 31, 2022, Guardian Wealth Management, Inc. has no material changes to report.

In the future, should the content of this form materially change from its previous publication, this section will articulate such material changes.

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Advisory Business

Describe your advisory firm, including how long you have been in business. Identify your principal owner(s).

Guardian Wealth Management, Inc. was founded in 2010. Currently, Guardian has three wealth managers working directly with clients and client accounts; and a client service manager who works with our clients on servicing issues but who provides no investment advice or management.

Joshua R. Kirby owns Guardian Wealth Management, Inc. and is the President and Chief Executive Officer of the firm. Mr. Kirby is a graduate of the University of Illinois. Mr. Kirby has recently joined the financial services industry. Mr. Kirby purchased Guardian Wealth Management from its founder, Ron Kirby, who continues to work with the firm. Mr. Kirby has no disciplinary events or history to report.

Ron Kirby is an Executive Wealth Manager with Guardian Wealth Management, Inc. Ron Kirby graduated from Illinois State University and has been in the financial service industry since 1997. From 1997 until 2010, Ron Kirby was a registered representative with Investment Planners, Inc., and a wealth manager with IPI Wealth Management, Inc. Ron Kirby founded Guardian Wealth Management and served as its President and Chief Executive Officer from 2010 through 2020.

In addition to Guardian, Ron Kirby maintains a registration as a Registered Representative with Purshe Kaplan Sterling Investments, a FINRA registered broker/dealer. When acting as a Registered Representative, Mr. Kirby is compensated through securities commissions derived from those transactions. Ron Kirby has no disciplinary events or history to report.

Julie A. Evans is an Executive Wealth Manager with Guardian Wealth Management, Inc. Ms. Evans studied at Illinois Central College. Ms. Evans has been in the financial services industry since 2000. From 2000 until 2010, Ms. Evans was a registered representative with Investment Planners, Inc. From 2007 until 2010, Ms. Evans was a wealth manager with IPI Wealth Management, Inc.

In addition to Guardian, Ms. Evans maintains a registration as a Registered Representative with Purshe Kaplan Sterling Investments, a FINRA registered broker/dealer. When acting as a Registered Representative, Ms. Evans is compensated through securities commissions derived from those transactions. Ms. Evans has no disciplinary events or history to report.

Describe the types of advisory services you offer. If you hold yourself out as specializing in a particular type of advisory service, such as financial planning, quantitative analysis, or market timing, explain the nature of that service in greater detail. If you provide investment advice only with respect to limited types of investments, explain the type of investment advice you offer, and disclose that your advice is limited to those types of investments.

Guardian Wealth Management, Inc. offers two different types of advisory services.

First, Guardian offers Investment Advisory Services. Investment Advisory Services are where Guardian manages and supervises the investment, allocation, and monitors the performance of securities held in the client's account in exchange for the payment of a fee. The relationship is ongoing until terminated by either party. All clients are eligible to select Investment Advisory Services if they feel it meets their needs. The amount of time spent on each client will vary based on the complexity of the client's financial situation. The larger and more diversified the client's account, the more time required to monitor the account.

The second is Investment Planning Services. Investment Planning Services are where Guardian provides an investment plan to the client for his/her own implementation for a fixed payment. The relationship is not ongoing and is limited to the production of a plan for a fee. All clients are eligible to select Investment Planning Services if they feel it meets their needs. The number of hours spent preparing the client's investment plan will vary based on the complexity of the client's financial situation. A client opting for Investment Planning Services will be given an estimate of how many hours will be necessary to gather the necessary information and to prepare an investment plan before agreeing to enter into an Investment Planning Services Agreement.

All of the investment management services are designed to the individual Investment Policy Statement (IPS). The IPS is designed after completing a personal Investment Questionnaire, which covers such topics as time horizon, risk tolerance and other personalized information. The IPS is used to provide a means for Guardian to manage the account within the standards established for the account. The IPS is reviewed annually with clients as a means to evaluate if any changes have occurred that would perhaps lead to an investment modification.

Other Non Advisory Services

Guardian also attempts to evaluate the investments with respect to each client in the areas of income taxes. This normally includes the clients need for annual income, ordinary income treatment and capital gain income. We do not provide tax counseling, we do attempt to assist in coordinating the investments with the personal income tax situation for each client when possible in conjunction with the clients accountant.

Lastly, Guardian also assists clients in the area of estate planning. While Guardian does not provide legal counseling in this area, we do encourage, work with and many times assist in coordination of estate planning for clients. The estate planning many times has an impact on the titling of investments which are managed by Guardian. The firm does not receive any compensation for any assistance in this area from clients or attorney's fees.

Explain whether (and, if so, how) you tailor your advisory services to the individual needs of clients. Explain whether clients may impose restrictions on investing in certain securities or types of securities.

In either type of advisory service arrangement, Guardian will collect information related to the client's objectives, goals, family situation, risk tolerance, and net worth. In the case of Investment Advisory Services, the information gathered will be used to establish an Investment Policy Statement (IPS) which guides the client's investments and allocation going forward. Should the client's situation change, the client needs to update Guardian on those changes so that the IPS can be updated and any necessary investment alterations can be recommended.

If you participate in wrap fee programs by providing portfolio management services, (1) describe the differences, if any, between how you manage wrap fee accounts and how you manage other accounts, and (2) explain that you receive a portion of the wrap fee for your services.

Guardian does not participate in wrap fee programs.

If you manage *client* assets, disclose the amount of *client* assets you manage on a *discretionary basis* and the amount of *client* assets you manage on a *non-discretionary basis*. Disclose the date "as of" which you calculated the amounts.

As of March 31, 2022, Guardian manages over \$194,000,000 in client assets under its Investment Advisory Services. Assets are managed on both a discretionary and non- discretionary basis. The method for determining these assets is the same as is required in the ADV Part I filed with the Securities Exchange Commission (SEC).

Fees and Compensation

Describe how you are compensated for your advisory services. Provide your fee schedule. Disclose whether the fees are negotiable.

Guardian Wealth Management, Inc. charges fees to its clients for providing services. In the typical Investment Advisory Agreement, Guardian charges a fixed percentage of assets under management as its fee. For example, if the client hires Guardian to manage \$1,000,000 and Guardian is charging 1% per year, billed quarterly, then the client would pay Guardian \$2,500 each quarter (assuming an account value which does not change).

Guardian also offers fee based planning. In a fee based planning arrangement, Guardian charges a fee on a one time basis and in return provides an investment plan for the client to implement and monitor on his/her own. Guardian does not assume management of the plan going forward and earns no compensation from the plan beyond providing the original document.

The Investment Advisory Services Agreement with Guardian is terminable at any time. Any fees paid by the client, but unearned based on the termination date, will be refunded to the client.

All fees earned by Guardian are based on the closing account value on the last day of each quarter.

In general, the following represents the model fee table for Guardian Wealth Management, Inc.:

Assets under Advice		Annual Fee
\$0	to \$250,000	at 2%
\$250,001	to \$500,000	at 1.5%
\$500,001	to \$1,000,000	at 1.25%
\$1,000,001	to \$2,000,000	at 1%
\$2,000,001	and above	at 0.75%

Hourly fees range from \$150 to \$250 per hour.

Fees charged by Guardian are negotiable and are settled on at the time of execution of the Investment Advisory Service Agreement.

Describe whether you deduct fees from *clients'* assets or bill *clients* for fees incurred. If *clients* may select either method, disclose this fact. Explain how often you bill *clients* or deduct your fees.

All fees are deducted directly from the managed account. Such charges will be reflected in the client account statement issued by the custodian.

Describe any other types of fees or expenses *clients* may pay in connection with your advisory services, such as custodian fees or mutual fund expenses. Disclose that *clients* will incur brokerage and other transaction costs, and direct *clients* to the section(s) of your *brochure* that discuss brokerage.

Since Guardian does not execute transactions nor maintain custody of client accounts, Guardian does not charge separate fees and expenses. Any fees or expenses charged by investment companies or custodians will be disclosed by those companies and/or custodians and will be included in those entities agreements and offering documents. For additional information, see the Brokerage and Soft Dollar section of this document.

If you or any of your *supervised persons* accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, disclose this fact and respond to Items 5.E.1, 5.E.2, 5.E.3 and 5.E.4.

1. **Explain that this practice presents a conflict of interest and gives you or your *supervised persons* an incentive to recommend investment products based on the compensation received, rather than on a *client's* needs. Describe generally how you address conflicts that arise, including your procedures for disclosing the conflicts to *clients*. If you primarily recommend mutual funds, disclose whether you will recommend "no-load" funds.**
2. **Explain that *clients* have the option to purchase investment products that you recommend through other brokers or agents that are not affiliated with you.**
3. **If more than 50% of your revenue from advisory *clients* results from commissions and other compensation for the sale of investment products you recommend to your *clients*, including asset-based distribution fees from the sale of mutual funds, disclose that commissions provide your primary or, if applicable, your exclusive compensation.**
4. **If you charge advisory fees in addition to commissions or markups, disclose whether you reduce your advisory fees to offset the commissions or markups.**

Guardian is only compensated through its management fees. That means that Guardian is "fee-based". Guardian receives no additional compensation on transactions which occur under an Investment Advisory Services Agreement.

If Guardian recommends a security which will be held outside of the custodian, and for which the transaction will occur through a broker/dealer, the Guardian advisor may receive compensation through a FINRA registered broker/dealer. A client has the right to purchase securities recommended by a Guardian advisor acting as a Registered Representative through another Registered Representative or FINRA broker/dealer.

Performance Based Fees

If you or any of your *supervised persons* accepts *performance-based fees* - that is, fees based on a share of capital gains on or capital appreciation of the assets of a *client* (such as a *client* that is a hedge fund or other pooled investment vehicle) - disclose this fact. If you or any of your *supervised persons* manage both accounts that are charged a *performance-based fee* and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee, disclose this fact. Explain the conflicts of interest that you or your *supervised persons* face by managing these accounts at the same time, including that you or your *supervised persons* have an incentive to favor accounts for which you or your *supervised persons* receive a *performance-based fee*, and describe generally how you address these conflicts.

Guardian Wealth Management, Inc. does not charge performance based fees. All fees earned by Guardian are based on the closing account value on the last day of each quarter. The fee does not change, though the actual amount of the fee will vary with the account balance.

Type of Clients

Describe the types of *clients* to whom you generally provide investment advice, such as individuals, trusts, investment companies, or pension plans. If you have any requirements for opening or maintaining an account, such as a minimum account size, disclose the requirements.

Guardian Wealth Management, Inc. works with individuals, high-net worth individuals, trusts, qualified plans (ex. 401(k)), charities, and businesses.

Typically, Guardian requires a client to have \$250,000 in investable assets under management.

Method of Analysis, Investment Strategies and Risk of Loss

Describe the methods of analysis and investment strategies you use in formulating investment advice or managing assets. Explain that investing in securities involves risk of loss that *clients* should be prepared to bear.

Guardian Wealth Management, Inc. does not have any proprietary investment strategies or methods of analysis. Rather, Guardian utilizes mainstream methods to analyze and review client investment recommendations, including fundamental and technical analysis.

Our investment philosophy strives to provide income, capital appreciation & capital preservation through a disciplined approach of asset allocation, security selection, and portfolio construction which is consistent with long-term wealth building, inflation protection and the realization of each client's goals and objectives.

Investing in the stock market is particularly risky. Although the market has on average returned almost 10% annually since the mid-1920's, in some individual years the market has been down almost 55%. You should not invest all or even a majority of your assets in the stock market if you do not fully understand its potential volatility and riskiness and are also mentally and financially able to absorb these risks and the potential for significant losses.

We recommend you invest your assets in the financial markets only after having carefully considered several factors, including: 1) your time horizon, 2) your risk tolerance and 3) your investment goals and objectives.

Given the significant potential losses described above we recommend that you invest in a well diversified portfolio of stocks, bonds, and/or mutual funds and that you are prepared both mentally and financially to withstand the potential for material losses over both short and long term investment time horizons while attempting to meet your investment goals and objectives.

Fundamental analysis - Guardian will review the value of a security through economic and financial factors including the position of the issuing company's within its industry, the industry's position within the economy, the management of company, and whether analysis indicates that the security is overpriced, underpriced, or fairly priced. Guardian may rely on outside investment advisors to obtain this analysis.

Technical analysis - Guardian will examine market movement in an overall attempt to determine any recurring patterns that could repeat themselves are present and how a client may be able to take advantage of those patterns.

Mutual fund analysis - Guardian will examine the performance history of mutual funds, by class and individually. Guardian will identify funds which have consistently performed in the top two quartiles of their respective investment classes and are expected to continue to surpass their class peers. Naturally, past performance does not guarantee future results.

Guardian Wealth Management performs analysis on individual stocks or bonds. Guardian also works in conjunction with other investment manager(s), when necessary, to analyze individual stocks and bonds. For diversification purposes, if alternatives investments are warranted, Guardian analyzes all provided information. Some of the information would include the Private Placement Memorandums or Prospectus to determine if the investment would be a recommended holding for the account before making a recommendation to the client.

Guardian advises all clients that investment involves risk, including the risk of loss of principal. In general, the higher the expected rate of return on an investment -the greater the risk of loss which exists. Conservative investments tend to have lower rates of return and lower risk of loss. While aggressive investments tend to have higher rates of return and higher risk of loss.

For each significant investment strategy or method of analysis you use, explain the material risks involved. If the method of analysis or strategy involves significant or unusual risks, discuss these risks in detail. If your primary strategy involves frequent trading of securities, explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

See above.

If you recommend primarily a particular type of security, explain the material risks involved. If the type of security involves significant or unusual risks, discuss these risks in detail.

Guardian does not recommend on particular kind of security. Guardian searches for investments that meet the client's needs, risk tolerance, time horizon and goals.

Disciplinary Information

If there are legal or disciplinary events that are material to a *client's* or prospective *client's* evaluation of your advisory business or the integrity of your management, disclose all material facts regarding those events.

Guardian Wealth Management, Inc., nor its personnel, has any legal or disciplinary history. In the event that such an issue ever arises, Guardian will report such information in an updated ADV Part 2.

Other Financial Industry Activities and Affiliations

If you or any of your *management persons* are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, disclose this fact.

Guardian advisors are also registered as Registered Representatives of Purshe Kaplan Sterling Investments, a FINRA registered broker/dealer. Any transaction executed through Purshe Kaplan Sterling is done outside of the Guardian advisory account. No client is required to have any account outside of Guardian, nor is any client required to use Purshe Kaplan Sterling for brokerage transactions.

Compensation received for transactions done outside of Guardian, whether through Purshe Kaplan Sterling or another brokerage firm, involves separate and customary compensation.

Guardian advisors may also be actively involved as an insurance agent. In that role, Guardian advisors recommend insurance contracts/policies which are issued by the insurance carrier. Guardian advisors receive commission on such sales separate and apart from investment advisory fees paid by clients. Guardian Wealth Management, Inc. always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Guardian Wealth Management, Inc. in their capacity as an insurance agent.

If you or any of your *management persons* are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, disclose this fact.

No such persons or applications exist or are pending.

Describe any relationship or arrangement that is material to your advisory business or to your *clients* that you or any of your *management persons* have with any *related person* listed below. Identify the *related person* and if the relationship or arrangement creates a material conflict of interest with *clients*, describe the nature of the conflict and how you address it.

No such relationship or arrangement exists.

If you recommend or select other investment advisers for your *clients* and you receive compensation directly or indirectly from those advisers that creates a material conflict of interest, or if you have other business relationships with those advisers that create a material conflict of interest, describe these practices and discuss the material conflicts of interest these practices create and how you address them.

Guardian Wealth Management, Inc. maintains a working relationship with other Investment Advisors. When appropriate, Guardian recommends these other advisors to our clients. Any other advisor will be required to provide its own Advisory Agreement for its services, as well as a separate ADV Part 2. Guardian does not accept any compensation from these advisors for their services nor for referring clients to them.

Guardian recommends other advisors when those advisors provide services which supplement the services that Guardian provides. For instance, Guardian may recommend another advisor which specializes in individual equities or corporate or municipal bonds. In those instances, Guardian continues to monitor the

client's account and the other advisors' performance. At any time, if Guardian determines that the other advisor is no longer performing in a way which satisfies the clients' needs, Guardian will act to terminate the other advisor's services and will seek other investment alternative solutions for their clients. At such time, after obtaining client approval, Guardian will transition the assets to the recommended alternative investment solutions. Guardian will manage the account within the Investment Policy Statement, with the ongoing evaluation of achieving the goals and objectives established for the investments.

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

If you are an SEC-registered adviser, briefly describe your code of ethics adopted pursuant to SEC rule 204A-1 or similar state rules. Explain that you will provide a copy of your code of ethics to any *client* or prospective *client* upon request.

Guardian Wealth Management, Inc. maintains a Code of Ethics which among other things requires that all transactions within a client's account are executed for the best interest of the client and that the client's interests are always the primary motivation for any recommendation or execution.

In the event that a client holds securities which are also held by Guardian and/or its personnel, any transaction in such security will occur so that the client benefits before Guardian and/or its personnel. In the event of a sale of a security which the client and Guardian intend to participate, the client will have his/her transaction conducted in a manner which leaves him/her better off or equal to Guardian. In the event of a purchase of a security which the client and Guardian intend to participate, the client will have his/her transaction conducted in a manner which leaves him/her better off or equal to Guardian.

This may be accomplished through the aggregation of trades. Aggregation allows all parties put together to achieve the same price without consideration for who owns the stock and thus removing any conflict over which party receives a better price.

A copy of the firm's Code of Ethics is available to clients and prospective clients upon request.

If you or a *related person* recommends to *clients*, or buys or sells for *client* accounts, securities in which you or a *related person* has a material financial interest, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

Guardian does not recommend, buy or sell securities in which it or any related person has a material financial interest.

If you or a *related person* invests in the same securities (or related securities, e.g., warrants, options or futures) that you or a *related person* recommends to *clients*, describe your practice and discuss the conflicts of interest this presents and generally how you address the conflicts that arise in connection with personal trading.

See above.

If you or a *related person* recommends securities to *clients*, or buys or sells securities for *client* accounts, at or about the same time that you or a *related person* buys or sells the same securities for your own (or the *related person's* own) account, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

See above.

Brokerage and Soft Dollar Practices

Describe the factors that you consider in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (e.g., commissions).

Some Guardian advisors are also registered as Registered Representatives of Purshe Kaplan Sterling, a FINRA registered broker/dealer. Any transaction executed through Purshe Kaplan Sterling is done outside of the Guardian advisory account. No client is required to have any account outside of Guardian and its custodian, nor is any client required to use Purshe Kaplan Sterling for brokerage transactions.

Guardian believes that its affiliated personnel are best positioned to know about the client and his/her needs. As such, Guardian believes that its personnel are best positioned to execute securities trades when such trades must occur outside of the Investment Advisory Services Agreement. However, Guardian will recommend other Registered Representatives if the client wishes someone else to transact the securities trades. Any compensation or commission earned by Guardian personnel will be the usual and customary commission for such a transaction.

If you receive research or other products or services other than execution from a broker-dealer or a third party in connection with *client* securities transactions ("soft dollar benefits"), disclose your practices and discuss the conflicts of interest they create.

Guardian does not receive soft dollar benefits from others in connection with client securities transactions. Any research or information received by Guardian from others through whom Guardian utilizes services or products is not based on client transactions, but rather subscription, contractual agreement or working relationship. The research or information would be provided to Guardian regardless of client transactions.

If you consider, in selecting or recommending broker-dealers, whether you or a *related person* receives *client* referrals from a broker-dealer or third party, disclose this practice and discuss the conflicts of interest it creates.

Guardian does not recommend other FINRA broker/dealers unless requested. When requested, Guardian recommends broker/dealers it knows offer good service and will look out for the client's best interest without regard for compensation.

If you routinely recommend, request or require that a *client* direct you to execute transactions through a specified broker-dealer, describe your practice or policy. Explain that not all advisers require their *clients* to direct brokerage. If you and the broker-dealer are affiliates or have another economic relationship that creates a material conflict of interest, describe the relationship and discuss the conflicts of interest it presents. Explain that by directing brokerage you may be unable to achieve most favorable execution of *client* transactions, and that this practice may cost *clients* more money.

Guardian does not routinely recommend, request or require that a client direct the execution of transactions through a specified broker/dealer. Guardian personnel will execute brokerage transactions through its existing registrations unless the client desires otherwise.

If you permit a *client* to direct brokerage, describe your practice. If applicable, explain that you may be unable to achieve most favorable execution of *client* transactions. Explain that directing brokerage may cost *clients* more money. For example, in a directed brokerage account, the *client* may pay higher brokerage commissions because you may not be able to aggregate orders to reduce transaction costs, or the *client* may receive less favorable prices.

Guardian will recommend other Registered Representatives if the client wishes someone else to transact the securities trades. Any compensation or commission earned by Guardian personnel will be the usual and customary commission for such a transaction. Guardian cannot control and does not warrant the client's ability to receive the lowest brokerage commissions. Likewise, Guardian cannot control and does not warrant that the client will be able to aggregate his/her order with others to reduce transaction costs.

Discuss whether and under what conditions you aggregate the purchase or sale of securities for various *client* accounts. If you do not aggregate orders when you have the opportunity to do so, explain your practice and describe the costs to *clients* of not aggregating.

Guardian aggregates trades when multiple clients are executing trades in the same security at the same time, or when the security is held personally by a Guardian affiliated person who wishes to execute a trade in the same security at the same time.

Transactions costs are assessed by transaction. By aggregating trade execution, the number of transactions is reduced, and therefore the transaction costs are reduced.

Review of Accounts

Indicate whether you periodically review *client* accounts or financial plans. If you do, describe the frequency and nature of the review, and the titles of the *supervised persons* who conduct the review.

Guardian Wealth Management, Inc. reviews client accounts and holdings on a regular basis, but not less than quarterly. The reviews are conducted to ensure that the information provided in the Investment Policy Statement is being met by the client's account holdings. In the case of individual fund or stock holdings, if news arises which affects an individual holding, Guardian will review accounts more frequently. The reviews are conducted by Joshua Kirby- the firm's President and Chief Executive Officer, as well as Ron Kirby and Julie Evans - the firm's Executive Wealth Managers. Julie Robertson, our client services manager, does not provide investment advice to clients but does have direct client contact with clients regarding the administration and servicing aspects related to client accounts.

If you review *client* accounts on other than a periodic basis, describe the factors that trigger a review.

In the case of individual fund or stock holdings, if news arises which affects an individual holding, Guardian will review accounts more frequently. Such news could be specific to a security or general the markets as a whole.

Describe the content and indicate the frequency of regular reports you provide to *clients* regarding their accounts. State whether these reports are written.

Guardian provides quarterly reports, in writing, to clients regarding the value or the client account as well as its holdings.

Client Referrals and Other Compensation

If someone who is not a *client* provides an economic benefit to you for providing investment advice or other advisory services to your *clients*, generally describe the arrangement, explain the conflicts of interest, and describe how you address the conflicts of interest. For purposes of this Item, economic benefits include any sales awards or other prizes.

Guardian receives no economic benefit from others for providing investment advice to clients.

If you or a *related person* directly or indirectly compensates any *person* who is not your *supervised person* for *client* referrals, describe the arrangement and the compensation.

Guardian Wealth Management, Inc. has the ability to contract with unaffiliated Investment Advisor Representatives (Solicitors). Such Solicitors would be compensated by Guardian for the referral of new clients based on the fees Guardian charges to advise such clients. Solicitors are not given access to or the ability to transact business on behalf of clients. Any Solicitation arrangement and the associated compensation arrangement would be disclosed to the referred client prior to execution of the Investment Advisory Agreement.

Custody

If you have *custody* of *client* funds or securities and a qualified custodian sends quarterly, or more frequent, account statements directly to your *clients*, explain that *clients* will receive account statements from the broker-dealer, bank or other qualified custodian and that *clients* should carefully review those statements. If your *clients* also receive account statements from you, your explanation must include a statement urging *clients* to compare the account statements they receive from the qualified custodian with those they receive from you.

Guardian Wealth Management, Inc. does not maintain custody of client funds or investments. At present, Guardian uses Charles Schwab Institutional as the custodian of client funds and investments. Schwab issues separate statements for all client accounts. Clients should compare the statements issued by Schwab with those issued by Guardian to ensure that the holdings and values match.

Investment Discretion

If you accept *discretionary authority* to manage securities accounts on behalf of *clients*, disclose this fact and describe any limitations *clients* may (or customarily do) place on this authority. Describe the procedures you follow before you assume this authority (*e.g.*, execution of a power of attorney).

Guardian Wealth Management, Inc., in some accounts, does maintain investment/trading authority. Guardian directs execution of business in client accounts based on that discretion and in the best interests of the client, and then such execution is accomplished by the custodian.

Voting Client Securities

If you have, or will accept, authority to vote *client* securities, briefly describe your voting policies and procedures, including those adopted pursuant to SEC rule 206(4)-6. Describe whether (and, if so, how) your *clients* can direct your vote in a particular solicitation. Describe how you address conflicts of interest between you and your *clients* with respect to voting their securities. Describe how *clients* may obtain information from you about how you voted their

securities. Explain to *clients* that they may obtain a copy of your proxy voting policies and procedures upon request.

Guardian Wealth Management, Inc. does not seek nor exercise proxy voting authority on behalf of its clients. Guardian believes clients should remain engaged and informed about the companies in which they own shares of stock. Reviewing annual reports and voting in any corporate voting is a good way for clients to remain educated and informed regarding the securities own within the account.

If you do not have authority to vote *client* securities, disclose this fact. Explain whether *clients* will receive their proxies or other solicitations directly from their custodian or a transfer agent or from you, and discuss whether (and, if so, how) *clients* can contact you with questions about a particular solicitation.

Clients will receive any proxies directly from the custodian or transfer agent. Clients should feel free to contact Guardian to discuss any proxy they do not understand or questions regarding how or where to vote.

Financial Information

If you require or solicit prepayment of more than \$500 in fees per *client*, six months or more in advance, include a balance sheet for your most recent fiscal year.

Guardian Wealth Management, Inc. does not require the prepayment of fees. Fees are paid each quarter for the quarter in which Investment Advisory Services are provided.

In the event that Guardian requires payment of fees in advance, in an amount of \$500 and more than six (6) months in advance of when services are rendered, financial information including a corporate balance sheet shall be provided to clients.