

GuardianWealth Inc.

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of GuardianWealth Inc. If you have any questions about the contents of this brochure, please contact us at (617) 955-9031 or by email at: uonokala@guardianwealthinc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about GuardianWealth Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. GuardianWealth Inc.'s CRD number is: 310012.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of GuardianWealth Inc. on March 30, 2021 are described below. Material changes relate to GuardianWealth Inc.'s policies, practices or conflicts of interests.

- GuardianWealth Inc. is offering Financial Literacy and Wellness Programs to clients and the general public. (Item 5)

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Item 4: Advisory Business

A. Description of the Advisory Firm

GuardianWealth Inc. (hereinafter “GUA”) is a corporation organized in the State of Massachusetts in May 2020. The principal owner is Ulunma Izejiobi.

B. Types of Advisory Services

Robo-Advisory Wrap Fee Portfolio Management & Financial Planning

GUA offers the GUA Wrap Fee Program (the “Program”), an automated online investment platform delivered through <https://guardianwealth.app>. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client’s age, risk tolerance, income, and current assets, among others. GUA will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

GUA also offers a financial planning service focused on investment planning. Investment planning involves working with clients to make sure their investments match their respective risk tolerance and goals. Specifically, the program includes a personalized content library that reflects the client’s financial status, live coaching, and workshops.

At GUA, advisory services are tailored to the individual risk tolerance and goal characteristics of clients as described by the client. Client goals and objectives are clarified in a goal/risk profile questionnaire that the client will complete through our online platform. The questionnaire is analyzed to determine the course of action for each individual client. Each client will complete a goal/risk profile that GUA will analyze for client preferences. Each client has the opportunity to place reasonable restrictions on the types of companies, industries, business sectors and individual companies, among other things, to determine the investments to be held in his or her portfolio. We review the client’s portfolio on a regular basis and at least annually. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant changes to his or her financial or personal circumstances, the client should consider such information in managing the client’s investments.

Services Limited to Specific Types of Investments

GUA generally limits its investment advice to equities and ETFs, although GUA may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

GUA will tailor a program for each individual client. Every user fills a risk profile questionnaire and is assigned a risk score. The risk score is used to assign a model portfolio. The risk questionnaire asks questions related to a client's age, employment status, income, existing saving, debt burden, investment timelines and behavioral/personality questions to determine the client's aversion to market volatility. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

D. Wrap Fee Programs

GUA acts as portfolio manager for a wrap fee program, which is an investment program where the client pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. However, this brochure describes GUA's non-wrap fee advisory services; clients utilizing GUA's wrap fee portfolio management should see the separate Wrap Fee Program Brochure from the wrap fee program's sponsor. GUA manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts. GUA receives the advisory fee set forth in Item 5 below as a management fee under the wrap fee program. Please also see Item 5 and Item 12 of this brochure.

E. Assets Under Management

GUA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	December 2021

Item 5: Fees and Compensation

A. Fee Schedule

The fee for financial planning and robo-advisory portfolio management are combined.

Total Assets	Fees
Up to \$50,000	\$5.00-15.99/month depending on features
Over \$50,000	0.35% of assets under management*

** An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets for purposes*

of determining the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty, for full refund of GUA's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Financial Literacy & Wellness Program

GUA provides financial literacy and wellness programs to clients and the general public.

B. Payment of Fees

Fees are withdrawn directly from the client's accounts with client's written authorization. These fees are paid monthly in arrears.

Payment of Financial Literacy & Wellness Program Fees

GUA has a free version and a paid for version at \$5/month. However, for our clients this is included in their monthly subscription.

C. Client Responsibility For Third Party Fees

This brochure describes GUA's non-wrap fee advisory services; clients utilizing GUA's wrap fee portfolio management should see the separate Wrap Fee Program Brochure. Client accounts not participating in the wrap fee program are responsible for the payment of all third party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by GUA. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

GUA collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither GUA nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

GUA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

GUA generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Charitable Organizations

There is no account minimum for any of GUA's services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

GUA's methods of analysis include Modern portfolio theory.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

GUA uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio

exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price

differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither GUA nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither GUA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither GUA nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

GUA does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

GUA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. GUA's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

GUA does not recommend that clients buy or sell any security in which a related person to GUA or GUA has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of GUA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GUA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. GUA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of GUA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of GUA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, GUA will never engage in trading that operates to the client's disadvantage if representatives of GUA buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on GUA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

GUA will require clients to use DriveWealth.

1. Research and Other Soft-Dollar Benefits

GUA does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

2. Brokerage for Client Referrals

GUA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

GUA will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

GUA does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews

For portfolio management accounts, GUA will review accounts on at least an annual basis. GUA will periodically contact you via email, the website, or through any other means appropriate to request that you review your investment plan to determine whether your investment plan should require updating. Should your circumstances change at times other than the requested review, it is your responsibility to notify us of those changes so that your investment plan is reviewed and adjusted as necessary. GUA provides electronic notification of confirmations of transactions and monthly statements of all activity in your advisory account. Ulunma Udodirim Izejiobi, Chief Executive Officer & Chief Compliance Officer for GUA, will conduct the reviews.

Financial planning accounts do not undergo this type of review.

B. Factors That Will Trigger a Non-Periodic Review

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each portfolio management client will receive a quarterly account statement from the custodian. GUA do not provide written reports to you, unless asked to do so. Written reports may result in additional charges to your account.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits

GUA does not receive any economic benefit, directly or indirectly from any third party for advice rendered to GUA's clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

GUA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

GUA does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Item 16: Investment Discretion

GUA provides discretionary portfolio management and non-discretionary financial planning services to clients. The advisory contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, GUA generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

GUA will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

GUA neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions

Neither GUA nor its management has any financial condition that is likely to reasonably impair GUA's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions

GUA has not been the subject of a bankruptcy petition in the last ten years.