

## FORM ADV PART 2A

East Guilford Financial Services LLC  
Firm Brochure

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This Brochure provides information about the qualifications and business practices of East Guilford Financial Services LLC. If you have any questions about the contents of this Brochure, please contact us at (203) 318-1177 or greg@egfs.us The information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (SEC), or any state securities authority.

Additional information about East Guilford Financial Services LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

References herein to East Guilford Financial Services LLC as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

## **Item 2 Material Changes**

This Item 2 only discusses material changes since the last update to this Brochure which was made on March 10, 2023.

East Guilford Financial Services and Mr. Gregory J. Guidone, its Sole Proprietor, filed to become a domestic limited liability company registered with the State of Connecticut under the name East Guilford Financial Services LLC; Mr. Guidone is the sole Managing Member. The date of the LLC filing was September 8, 2021.

East Guilford Financial Services LLC was granted registration with the Securities and Exchange Commission as a Large Advisory Firm due to the growth of its regulatory assets under advisement on December 22, 2021.

In 2020, Charles Schwab purchased TD Ameritrade which was East Guilford Financial Services LLC former custodian of record; the transaction was completed in 2023.

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### **Item 3**

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## **Item 4 Advisory Business**

East Guilford Financial Services LLC is an investment advisor registered with the Securities and Exchange Commission as of December 22, 2021 and formerly was registered with State of Connecticut since 2001. East Guilford Financial Services was a sole-proprietorship with Mr. Gregory J. Guidone as its Founder and only investment advisor. On September 8, 2021, Mr. Guidone filed to form a domestic limited liability company with the State of Connecticut under the business name East Guilford Financial Services LLC herein referred to as EGFS. Mr. Guidone is its sole Managing Member.

### ***EGFS Advisory Services:***

#### **ASSET MANAGEMENT**

Our firm provides continuous asset management of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop the client's personal investment policy. We create and manage client portfolios based on that unique policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's objectives, the Investment Advisory Agreement executed by the client as part of our investment advisory agreement (in which the client chooses an asset allocation model).

Once the client's portfolio has been established, we review the portfolio on a regular basis; and, if necessary, rebalance the portfolio based on the client's individual needs and/or as economic market conditions dictate.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- ADRs
- Warrants
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual funds and exchange traded funds

- United States governmental securities

Because some types of investments involve certain additional degrees of risk, they will only be implemented and/or recommended when consistent with the client's investment objectives, their Investment Advisory Agreement, tolerance for risk, liquidity and suitability.

Clients are free to impose restrictions of investing in certain types of securities; however, that may inhibit our ability to offer our services.

## **FINANCIAL PLANNING CONSULTATION SERVICES**

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

## **MUTUAL FUND ACCOUNT SERVICING**

Clients can assign mutual fund accounts to us to service. We will provide annual performance reports for those accounts and assist clients on any administrative matters related to them. We will provide investment advice concerning any purchases, redemptions and fund exchanges for these types of accounts.

## **BROKERAGE ACCOUNT SERVICING**

Clients can assign brokerage accounts to us to service. We will provide annual performance reports for these accounts and assist clients on any administrative matters related to them. We do not actively provide investment advice concerning any purchases, redemptions and exchanges in those accounts. We offer brokerage account services as an accommodation and do not charge a management fee on the assets. We no longer charge a flat processing fee of \$30.00. We only assist on the implementation of transactions based on client direction.

## **WRAP FEE PROGRAMS**

We do not offer wrap fee programs.

## **AMOUNT OF MANAGED ASSETS**

As of December 1, 2023, we were actively managing \$94,478,594 of clients' assets on a discretionary basis and \$60,329,986 of clients' assets on a non-discretionary basis for a total of \$154,808,580.

## **Item 5 Fees and Compensation**

## **ASSET MANAGEMENT FEES**

Our annual fees for Asset Management Services are based upon a percentage of assets under management and generally range from 0.25% to 1.00%.

The annualized fee for Asset Management Services are charged as a percentage of assets under management, according to the following schedule:

### ***Assets Under Management Annual Fee***

Up to \$50,000	1.00%
Over \$50,000 - \$100,000	\$500.00/year
Over \$100,000 - \$1,000,000	0.5%
Over \$1,000,000 - \$2,000,000	\$5,000.00/year
Over \$2,000,000	0.25%

### ***Limited Negotiability of Advisory Fees***

Although EGFS has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client. A conflict of interest exists whereby one client may pay more than another client for similar advisory services.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of advisory persons at our firm.

## **FINANCIAL PLANNING CONSULTATION FEES**

The EGFS Consultation Services fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Consultation Services fee is calculated and charged on a rate of \$150 per hour and is negotiable. An estimate for the total hours is provided at the start of the financial planning relationship. We do not offer ongoing monitoring services for providing Consultation Services.

Fees for consultation services are due when the services are rendered or may be billed quarterly in arrears based on actual hours accrued and some are charged in advance. The terms as to how the management fees are charged are listed in each client's Investment Advisory Agreement. As separate invoice showing the hourly totals will be sent to clients under this arrangement.

## MUTUAL FUND ACCOUNT SERVICING FEES

Our annual Mutual Fund Account Servicing Fees is 0.25% of the accounts we are actively servicing and are billed, or deducted, quarterly at 0.0625% in arrears and some are charged in advance. The terms as to how the management fees are charged are listed in each client's Investment Advisory Agreement.

## BROKERAGE ACCOUNT SERVICING FEES

We no longer charge a flat processing fee of \$30.00 per trade for brokerage accounts that we are servicing as an accommodation.

## GENERAL INFORMATION

**Termination of the Advisory Relationship:** A client agreement may be canceled at any time, by either party, for any reason, by written notice to the other party. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

**Mutual Fund Fees:** All fees paid to EGFS for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (ETFs), to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client needs to review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

**Additional Fees and Expenses:** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians, including, but not limited to, any transaction charges. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV 2A for additional information.

**ERISA Accounts:** EGFS is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts ("IRAs") pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in

prohibited transactions, EGFS may only charge fees for investment advice about products for which our firm does not receive any 12b-1 fees, or investment advice about products for which our firm receives 12b-1 fees, however, when such fees are paid to EGFS we deduct these fees from our investment advisory management fees.

***Advisory Fees in General:*** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

***Limited Prepayment of Fees:*** Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

EGFS does not charge performance-based fees.

## **Item 7 Types of Clients**

EGFS provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above

EGFS does not require a minimum account size for opening an account under advisement by EGFS.

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

### **METHODS OF ANALYSIS**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

***Asset Allocation.*** Rather than focusing on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.



***Mutual Fund and/or ETF Analysis.*** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the composition of a mutual fund or ETF in an attempt to determine if there is significant overlap in market capitalization and strategy. We also monitor the mutual funds and/or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

***Risks for all forms of analysis.*** Our securities analysis methodologies rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## ***INVESTMENT STRATEGIES***

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizons among other considerations.

***Long-term purchases.*** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

***Short-term purchases.*** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as potentially a less favorable tax treatment of short-term capital gains.

***Risk of Loss.*** Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

## **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

To date, no disciplinary events relating to our firm or its sole advisory person have occurred or are pending.

## **Item 10 Other Financial Industry Activities and Affiliations**

### **Management Personnel Registrations:**

Mr. Guidone is not registered and does not have an application pending to register as a broker-dealer or a registered representative of a broker-dealer. In addition to EGFS being a registered investment adviser, Mr. Guidone, the owner of EGFS, is a separately licensed insurance agent in Connecticut.

Clients should be aware that the receipt of additional compensation, such as commissions for selling insurance products, creates a conflict of interest that may impair the objectivity of our firm and its sole advisory person when making advisory recommendations.

EGFS endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of known material conflicts of interest, including the potential to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from EGFS;
- we seek to collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's sole advisory person conducts reviews of each client account to verify that recommendations made to a client meet its best interest obligations to the

client's specific needs and circumstances and that our fiduciary responsibility has been met;

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

EGFS has a written Code of Ethics which governs the conduct of its advisory persons. A free and complimentary copy is available upon a client's written request. EGFS expects to meet a high ethical standard in all aspects of its business. We do not recommend to clients securities in which we have a material interest. We do invest in the same securities, typically mutual funds or ETFs, that we recommend to clients. We fully intend to comply with relevant securities laws and act with a duty of loyalty, fairness and good faith in all dealings with our clients.

## **Item 12 Brokerage Practices**

We do not receive research or other soft dollar benefits in connection with client securities transactions or from referring clients to a particular custodian.

We do not pay or receive referral fees for directing client transactions to a particular custodian, broker-dealer or mutual fund company.

For discretionary accounts, EGFS requests that clients open an account and direct us to place trades on their behalf through the custodian recommended by us; however; clients are free to choose their own custodian and provide similar instructions. Given our direct brokerage policy we may be unable to achieve the most favorable execution of client transactions. Some clients prefer to have their mutual funds held by the mutual fund company.

We do not aggregate orders for the purchase or sale of securities since our recommendations include mutual funds and ETS which are executed at the NAV on the day the order is placed. We do not typically recommend that clients purchase individual securities. On occasion we may place an order for sale of an existing security in an account at the request of the client.

## **Item 13 Review of Accounts**

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** EGFS reviews all portfolios for its clients, at minimum, on a weekly basis, and usually daily. Mr. Guidone conducts all reviews.

**REPORTS:** In addition to the periodic statements, and confirmations of transactions, that clients receive from the companies that custody their funds, we provide customized

quarterly reports, and annual, performance reports that consolidate all of a client's holdings onto one statement.

## **MUTUAL FUND PORTFOLIO MANAGEMENT**

**REVIEWS:** EGFS reviews and monitors the performance of all mutual funds in which its clients are invested, on a quarterly basis and tracks all client holdings on an internally prepared spreadsheet.

**REPORTS:** Clients will receive reports, generated by the mutual funds that they own, directly from the mutual fund company when the funds are held there.

## **PORTFOLIO MANAGEMENT SERVICES**

**REVIEWS:** EGFS reviews all portfolios for its clients, at minimum, on a weekly basis, and usually daily. Mr. Guidone is responsible for all reviews.

**REPORTS:** In addition to the periodic statements, and confirmations of transactions, that clients receive from the companies their custodian we provide quarterly reports only to asset management clients. We provide annual performance reports that consolidate all of a client's holdings onto one statement to all clients.

## **FINANCIAL PLANNING CONSULTATION SERVICES**

**REVIEWS:** While standard, inclusive reviews may occur at different stages of the client relationship depending on the nature and terms of the specific engagement no additional fees for financial planning consulting will be charged unless otherwise separately contracted for. All such reviews will be conducted by Mr. Guidone.

**REPORTS:** Consultation Services clients will not typically receive customized, internally generated reports due to the nature of this service.

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

EGFS does not engage solicitors or pay related or non-related persons for referring potential clients to our firm.

EGFS does not accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

## **Item 15 Custody**

EGFS does not custody any of its clients' funds or securities. However, a client, at their discretion, may sign an agreement with the custodian of their funds which allows the

custodian to deduct our investment advisory fee from the clients' account as directed by us.

## **Item 16 Investment Discretion**

An Investment Advisory Agreement is part of the investment advisory agreement that every client executes when retaining the services of EGFS for asset management services. On that Investment Advisory Agreement, clients may define the scope of discretionary powers they are granting to EGFS. These powers may allow us to place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell

Clients may also change/amend such limitations, at any time, by once again providing us with updated written instructions. In addition, at least once per year, the client will receive a copy of the Investment Advisory Agreement currently on file together with a questionnaire and be asked to notify us if they wish to change the scope of the discretionary powers or other information that we currently maintain on file.

## **Item 17 Voting Client Securities**

EGFS does receive some proxy notices on behalf of its advisory clients. Typically, for proxies on securities held at Charles Schwab, EGFS will vote as the board recommends. With regard to mutual fund proxies held directly with the fund, the client receives these proxies directly and is responsible for voting them directly. We may upon request provide proxy voting advice to our clients.

## **Item 18 Financial Information**

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. EGFS has no adverse financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to produce a financial statement.

EGFS has not been the subject of a bankruptcy petition at any time during the past ten years.

## **Item 19 Requirements for State-Registered Advisers**

Not Applicable.