Item 1: Cover Page

Guide Financial Planning, LLC

3600 Lexington Ave N. Ste. 204
Shoreview, MN 55126
651-461-2121

www.guidefp.com

Form ADV Part 2A - Firm Brochure

Dated: January 08, 2024

This Brochure provides information about the qualifications and business practices of Guide Financial Planning, LLC, "GFP". If you have any questions about the contents of this Brochure, please contact us at 651-461-2121. 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.

Guide Financial Planning, LLC is registered as an Investment Adviser with the State of Minnesota. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about GFP is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the firm's identification number 170734.

Item 2: Material Changes

The last annual update of this Brochure was filed on February 3, 2023, the following changes have been made to this version of the Disclosure Brochure:

- Section 12 was updated to reflect Charles Schwab & Co., Inc. as the recommended custodian.
- Amy Artiga now holds the Certified Financial Planner designation, Cal Treichler holds the Certified Student Loan Professional designation, and information for Ben Wacek's Certified Kingdom Advisor designation was added.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of GFP.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at http://www.adviserinfo.sec.gov by searching for our firm name or by our CRD number 170734.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 651-461-2121.

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Item 4: Advisory Business

Description of Advisory Firm

Guide Financial Planning, LLC is registered as an Investment Adviser with the States of Minnesota, Virgina, Texas, Florida, California and Wisconsin. We were founded in May of 2014. Benjamin Wacek is the principal owner of GFP. As of December 2023, GFP reports \$41,027,626 in discretionary and \$0 in non-discretionary assets under management.

Types of Advisory Services

Ongoing Financial Planning

This service involves working one-on-one with a planner on an ongoing basis. By paying a monthly/quarterly retainer, clients get continuous access to a planner who will work with them to implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow up meeting is required, we will meet at the client's convenience. The plan and the client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On an annual basis there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

Investment Management Services

Investment Management Services are available to clients engaged in our Ongoing Financial Planning Service and are not offered as a standalone service. We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment 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 a client's personal investment policy or an investment plan with an asset allocation target and create and

manage a portfolio, on a discretionary basis, based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

Comprehensive Financial Plan Development

We develop comprehensive financial plans that cover topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

We complete a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of a comprehensive financial plan is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

• Retirement Planning: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- College Savings: Includes projecting the amount that will be needed to achieve college or other
 post-secondary education funding goals, along with advice on ways for you to save the desired
 amount. Recommendations as to savings strategies are included, and, if needed, we will review
 your financial picture as it relates to eligibility for financial aid or the best way to contribute to
 grandchildren (if appropriate).
- Cash Flow and Debt Management: We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- Employee Benefits Optimization: We will provide review and analysis as to whether you, as an
 employee, are taking the maximum advantage possible of your employee benefits. If you are a
 business owner, we will consider and/or recommend the various benefit programs that can be
 structured to meet both business and personal retirement goals.
- Estate Planning: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals**: We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- Investment Analysis: This may involve developing an asset allocation strategy to meet your
 financial goals and risk tolerance, providing information on investment vehicles and strategies,
 reviewing employee stock options, as well as assisting you in establishing your own investment

account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Quick Start Session

GFP offers a "Quick Start Session" for those who don't feel that they are in need of a full financial plan, but rather just have one or two pressing financial questions they would like to have answered. For this service, clients provide pertinent information to GFP at the time of a 1½ hour meeting to cover these pressing financial planning questions. If the questions that the clients have pertain to their investments, GFP will ask them to complete a risk tolerance questionnaire to ensure that recommendations are made in alignment with the client's risk tolerance and goals. Similarly, all recommendations made by GFP in the Quick Start Session will be specifically tailored to the client's situation and not be generic advice. After the meeting, GFP sends an email to the client to summarize the discussion and to provide specific next steps to the client. After this email is sent, the engagement with GFP is complete and it is up to the client to implement recommendations.

Project-Based Financial Planning

As needed, GFP offers project-based financial planning engagements. In such engagements, GFP and the client come to a mutual decision as to the scope of the project.

Examples of project-based financial plans may include, but are not limited to:

- Providing specific investment recommendations for a work retirement plan based on the client's risk tolerance and goals.
- Assisting a client with analyzing multiple potential retirement scenarios.
- Updating a financial plan for a past client who chose not to engage in "Ongoing Financial Planning."

CCR Section 260.235.2 Disclosure

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through our firm.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client's current situation (income, tax levels, and risk

tolerance levels) so that we may construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below. Please note, lower fees for comparable services may be available from other sources.

Ongoing Financial Planning

Ongoing Financial Planning consists of an ongoing fee that is paid monthly, in advance, at the rate of \$125-\$800 per month. The specific fee is determined by how close the client is to retirement, the gross income of the client, and the overall complexity of the client's situation. The fee may be negotiable in certain cases. This service may be terminated with no advance notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

Investment Management Services

Investment Management Services are available to clients engaged in our Ongoing Financial Planning Service and are not offered as a standalone service. Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

| Account Value | Annual Advisory Fee |
|---------------------------|---------------------|
| \$1 - \$500,000 | 1.00% |
| \$500,001 - \$1,000,000 | 0.85% |
| \$1,000,001 - \$3,000,000 | 0.60% |
| \$3,000,001 and Above | Negotiable |

For our clients with accounts at TD Ameritrade, their fees will be billed in advance, at the beginning of each quarter, based on the total portfolio balance on the last day of the previous quarter. The advisory fee is a blended tier.

Advisory fees are directly debited from client accounts, or the client may choose to pay by check. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with no advance notice. Upon termination of the account, any unearned fee will be refunded to the client. Fees for Investment Management Services are negotiable.

For Investment Management Clients, monthly comprehensive financial planning fees may be waived based on an independent evaluation of the needs of the client and the complexity of the client's circumstances.

Comprehensive Financial Plan Development

We create comprehensive financial plans for a flat fee of \$1,500 to \$4,500. The specific fee is determined by how close the client is to retirement, the gross income of the client, and the overall complexity of the client's situation. At the execution of the advisory agreement \$500 is due, with the remainder due upon completion of the work. This service can be terminated at any time prior to the plan presentation, but the \$500 upfront fee is nonrefundable. GFP will not bill an amount above \$500 more than 6 months in advance. The fee may be negotiable in certain cases in order to reach a rate that both the client and GFP feels is fair. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

Quick Start Program

The cost of this program is \$600, billed in arrears upon the conclusion of the client meeting. Payment for this service may be made by electronic transfer or check. Since fees are due at the conclusion of the meeting, there are no termination or refund clauses for this service. Fees for the quick start program are negotiable.

Project-Based Financial Planning

Fees for project-based financial planning engagements will be determined together with the client based on the scope and complexity of the project and paid upon completion of the engagement. GFP charges a fee for project-based engagements no greater than \$6,000.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials,

transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions). We do not accept compensation for the sale of securities or other 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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals and high net-worth individuals.

We do not have a minimum account size requirement.

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

Our primary methods of investment analysis are fundamental, technical, cyclical and charting analysis.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods

without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may under-perform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline

when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of GFP or the integrity of our management. We have no information applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

We currently do not participate in other financial industry activities and are not affiliated with other financial firms.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity Associated persons shall offer and provide professional services with integrity.
- Objectivity Associated persons shall be objective in providing professional services to clients.
- Competence Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

- Confidentiality Associated persons shall not disclose confidential client information without
 the specific consent of the client unless in response to proper legal process, or as required by
 law.
- Professionalism Associated persons' conduct in all matters shall reflect credit of the profession.
- Diligence Associated persons shall act diligently in providing professional services.

We will, upon request, promptly provide a complete code of ethics.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by GFP's Chief Compliance Officer in advance of the transaction in an account. GFP maintains a copy of access persons' personal securities transactions as required. GFP, nor any related person recommends to clients or buys or sells for clients' accounts investments in which the adviser or related persons has a material financial interest.

Trading Securities At/Around the Same Time as Client's Securities

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities. GFP, nor any related person recommends to clients or buys or sells for clients' accounts investments in which the adviser or related persons has a material financial interest.

Item 12: Brokerage Practices

Factors Used to Select Custodians

Guide Financial Planning, LLC does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into

consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (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 the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends Charles Schwab & Co., Inc., a registered broker-dealer, member FINRA and SIPC ("Schwab"). Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with Schwab. We are not affiliated with Schwab. The Client will ultimately make the final decision of the custodian to be used to hold the Client's investments by signing the selected custodian's account opening documentation.

1. Research and Other Soft-Dollar Benefits

Advisor does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services[™] is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (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. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of

economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

- 1. 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.
- 2. 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 a 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
 - assist with back-office functions, recordkeeping, and Client reporting
- 3. 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
 - Consulting on technology, compliance, legal, and business needs
 - Publications and conferences on practice management and business succession
- 4. Your brokerage and custody costs. For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

2. Brokerage for Client Referrals

We receive 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

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve the most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian. Not all advisers require their clients to direct brokerage. By directing brokerage we may be unable to achieve most favorable execution of client transactions and this practice may cost clients more money.

We do not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees 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.

4. Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13: Review of Accounts

Benjamin Wacek, Managing Member and CCO of GFP, will work with clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. GFP does not provide specific reports to clients, other than financial plans.

Client accounts with the Investment Management Service will be reviewed regularly on a semi-annual basis by Mr. Wacek. During the regular review the account's performance is compared against like-managed accounts to identify any unacceptable performance deviation. Additionally, reasonable client imposed restrictions will be reviewed to confirm that they are being enforced. Events that may

trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

GFP will not provide written reports to Investment Management clients, other than financial plans.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

GFP does not hold, directly or indirectly, Client funds or securities, or have any authority to obtain possession of them. All Client assets are held at a qualified custodian.

If GFP deducts its advisory fee from Client's account(s), the following safeguards will be applied:

- i. The Client will provide written authorization to GFP, permitting us to be paid directly from Client's accounts held by the custodian.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

In jurisdictions where required, GFP will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Accounts with Schwab are always managed on a discretionary basis with respect to securities to be bought and sold and the amount of securities to be bought and sold. This discretionary authority is assumed when the client signs the account opening document. Investment discretion is explained to clients in detail when an advisory relationship has commenced. Clients may impose reasonable restrictions as to the securities and types of securities that the Adviser may buy or sell in managing their portfolio.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Benjamin Wacek serves as GFP's sole principal and CCO. Information about Benjamin Wacek's education, business background, and outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

Other Business Activities

Neither GFP nor Benjamin Wacek is involved with outside business activities.

Performance Based Fees

Please refer to Item 6 of this brochure.

Material Disciplinary Disclosures

No management person at Guide Financial Planning, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Neither Guide Financial Planning, LLC, nor Benjamin Wacek, have any relationship or arrangement with issuers of securities.

Business Continuity Plan

GFP maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding GFP, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Guide Financial Planning, LLC 3600 Lexington Ave N Ste. 204 Shoreview, MN 55126

651-461-2121

Form ADV Part 2B – Brochure Supplement

For

Benjamin Wacek

Managing Member and Chief Compliance Officer

Dated September 22, 2023

This brochure supplement provides information about Benjamin Wacek that supplements the Guide Financial Planning, LLC ("GFP") brochure. A copy of that brochure precedes this supplement. Please contact Benjamin Wacek if the GFP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Benjamin Wacek is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 5245247.

Item 2: Educational Background and Business Experience

Benjamin Wacek

Born: 1984

Educational Background

2006 – B.A. in Business Finance and Marketing, Bethel University

Business Experience

- 06/2014 Present, Guide Financial Planning, LLC, Managing Member and CCO
- 06/2012 05/2014, Counsel Wealth Management, Inc., Wealth Advisor
- 10/2006 05/2011, Laura A. Kuntz, CPA/PFS, MBT, Financial Advisor

Professional Designation(s)

CFP® (Certified Financial Planner):

Benjamin Wacek is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, Benjamin Wacek may refer to themself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and Benjamin Wacek may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

• Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP®

- professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

CKA® (Certified Kingdom Advisor®):

The CKA® designation is offered by Kingdom Advisors, Inc., a non-profit training organization for financial professionals who specialize in the planning differentiators that exist when you apply a Christian worldview to financial decision making.

- The prerequisites for the designation are that the advisor must hold one of the approved industry designations (CFP®, ChFC®, CPA, CPA/PFS, EA, CFA, CIMA®, AAMS, CLU®, JD) or 10 years of experience in the discipline in which applying for the CKA® designation. The disciplines include financial planning, investments, accounting, estate planning law, and insurance. The education prerequisites for the designation is a university-level 3-credit hour equivalent certificate course followed by a proctored exam.
- All candidates must sign a "Statement of Faith," obtain a letter of reference from their pastor or member
 of pastoral staff, pass a regulatory review, complete a signed statement of personal stewardship and
 submit two client references.
- The continuing education requirement to maintain the designation is 10 hours annually. Kingdom Advisors (KA) requires all CKA® designees to remain in substantial compliance with a set of ethical principles, rules, and standards in order to use or to continue to use the CKA® designation. In order to oversee such compliance, KA has established procedures for reporting ethical violations, as well as a set of disciplinary procedures to oversee the investigation of potential violations of such principles.

Item 3: Disciplinary Information

Benjamin Wacek has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Benjamin Wacek is not involved with outside business activities.

Item 5: Additional Compensation

Benjamin Wacek does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GFP.

Item 6: Supervision

Benjamin Wacek, as Managing Member and Chief Compliance Officer of GFP, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

- 1. Benjamin Wacek has NOT been involved in any of the events listed below.
 - a. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - i. An investment or an investment-related business or activity;
 - ii. Fraud, false statements, or omissions;
 - iii. Theft, embezzlement, or other wrongful taking of property;
 - iv. Bribery, forgery, counterfeiting, or extortion; or
 - v. Dishonest, unfair, or unethical practices.
 - An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - i. An investment or an investment-related business or activity;
 - ii. Fraud, false statements, or omissions;
 - iii. Theft, embezzlement, or other wrongful taking of property;
 - iv. Bribery, forgery, counterfeiting, or extortion; or
 - v. Dishonest, unfair, or unethical practices.
- 2. Benjamin Wacek has NOT been the subject of a bankruptcy petition at any time.

Guide Financial Planning, LLC 3600 Lexington Ave N Ste. 204 Shoreview, MN 55126

Form ADV Part 2B – Brochure Supplement

651-461-2121

For

Calvin Treichler

Investment Advisor Representative

Dated September 22, 2023

This brochure supplement provides information about Calvin Treichler that supplements the Guide Financial Planning, LLC ("GFP") brochure. A copy of that brochure precedes this supplement. Please contact 651-461-2121 if the GFP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Calvin Treichler is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 7353504.

Item 2: Educational Background and Business Experience

Calvin Treichler

Born: 1996

Educational Background

• 2018— B.S. in Finance and Public & Nonprofit Management, University of Minnesota - Twin Cities, Carlson School of Management

Business Experience

- 03/2021 Present, Guide Financial Planning, LLC, Investment Advisor Representative
- 06/2018 02/2021, Fure Financial Corporation, Associate Wealth Advisor
- 03/2011 06/2018, University of Minnesota Twin Cities, Carlson School of Management,
 Full-time education
- 05/2017 08/2017, Guide Financial Planning, LLC, Financial Planning Intern

Professional Designations

CFP (Certified Financial Planner)[®]: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the *Standards of Professional Conduct*.

 The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CSLP® (Certified Student Loan Planner™): The Certified Student Loan Professional™, CSLP® is a professional certification mark granted in the United States by Certified Student Loan Advisors Board of Standards, Inc. ("CSLA BOS"). The CSLP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CSLP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3)

ethical requirements that govern professional engagements with clients.

To attain the right to use the CSLP® mark, an individual must satisfactorily fulfill the following requirements:

- Education Obtain a college-level certificate of study in Student Loan Planning that CFP Board's studies
 have determined as necessary for the competent and professional delivery of financial planning services,
 and attain a Bachelor's Degree from a regionally accredited United States college or university (or its
 equivalent from a foreign university).
- have 2 years of industry experience as a licensed financial representative, state licensed insurance agent, how a CPA license or be an Enrolled agent,
- Ethics Agree to be bound by the CSLA Board's Standards of code of ethics and professional conduct.

CSLP® professionals who fail to comply with the above standards and requirements may be subject to CSLA Board's enforcement process, which could result in suspension or permanent revocation of their CSLP® certification.

Item 3: Disciplinary Information

Calvin Treichler has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Calvin Treichler is not involved with outside business activities.

Item 5: Additional Compensation

Calvin Treichler does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through GFP.

Item 6: Supervision

Benjamin Wacek as Chief Compliance Officer of GFP, is responsible for supervision. Clients may contact Benjamin Wacek at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Calvin Treichler has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Guide Financial Planning, LLC 3600 Lexington Ave N Ste. 204

Shoreview, MN 55126

651-461-2121

Form ADV Part 2B – Brochure Supplement

For

Amy Artiga

Associate Financial Planner & Operations Manager

Dated: September 22, 2023

This brochure supplement provides information about Amy Artiga that supplements the Guide Financial Planning, LLC ("GFP") brochure. A copy of that brochure precedes this supplement. Please contact 651-461-2121 if the GFP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Amy Artiga is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 7360807.

Item 2: Educational Background and Business Experience

Amy C. Artiga

Born: 1983

Educational Background

- 12/2020, Master of Science in Consumer Sciences, Family Financial Planning and Counseling; University
 of Alabama
- 12/2018, Master of Business Administration, Western Governors University
- 07/2013, Bachelor of Business Administration, Thomas Edison State University
- 05/2006, Bachelor of Theology, Portland Bible College

Business Experience (last 5 years)

- 02/2019 Present, Guide Financial Planning, LLC, Associate Financial Planner & Operations Manager
- 11/2015 11/2020, Indigo Marketing Agency, Lead Technical Writer

Professional Designations

CFP (Certified Financial Planner)[®]: The CERTIFIED FINANCIAL PLANNER[™], CFP[®] and federally registered CFP (with flame design) marks (collectively, the "CFP[®] marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- Continuing Education Complete 30 hours of continuing education hours every two years, including two
 hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain
 competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the *Standards of Professional Conduct*.

 The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3: Disciplinary Information

Amy Artiga has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Amy Artiga is currently the owner of Pastor's Wallet, where she writes blog posts, publishes books, and conducts webinars. This activity takes 2 hours/week of her time.

Item 5: Additional Compensation

Amy Artiga does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through GFP.

Item 6: Supervision

Benjamin Wacek as Chief Compliance Officer of GFP, is responsible for supervision. Clients may contact Benjamin Wacek at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Amy Artiga has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.