

# FORM ADV PART 2A DISCLOSURE BROCHURE



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This brochure provides information about the qualifications and business practices of Guanill Wealth Management, Inc. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 916-359-2750 and Exchange Commission, or by any state securities authority.

Additional information about Guanill Wealth Management, Inc. (CRD #281340) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**SEPTEMBER 30, 2020**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Since the last update on April 2, 2020, the following material updates have occurred:

- Item 4 has been updated to disclose the firm's new dba name.
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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### **Firm Description**

Guanill Wealth Management, Inc. dba Guanill Wealth Management, (“Advisor”) was founded in 2015. Edward S. Guanill is the sole owner.

Advisor is a fee-based financial planning and investment advisory firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm’s President is an insurance agent who sells insurance products with Guanill Insurance Brokers, Inc.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Under CCR Section 260.238(k), Advisor, its representatives or any of its employees will disclose to the clients all material conflicts of interest.

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### **Types of Advisory Services**

Advisor furnishes investment advice through consultations.

#### FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate Advisor on a fixed fee basis described in detail under “Fees and Compensation” section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. Under California Code of Regulations, 10 CCR Section 260.235.2, it requires that the conflict of interest, which exists between the interests of the investment advisor and the interests of the client when offering financial planning services, be disclosed. The client is under no obligation to act upon the investment advisor’s recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Advisor. Financial plans will be completed and delivered inside of sixty (60) days. Clients may terminate advisory services with thirty (30) days written notice.

#### SEMINARS AND WORKSHOPS

Advisor holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. Advisor does not charge a fee for attendance to these seminars.

#### SOLICITOR ARRANGEMENTS

Advisor solicits the services of third party money managers to manage client accounts. In such circumstances, Advisor receives solicitor fees from the third party money manager. Advisor acts as the liaison between the client and the third party money manager in return for an ongoing portion of the advisory fees charged by the third party money manager. Advisor helps the client complete the necessary paperwork of the third party money manager, provides ongoing services to the client, will provide the third party money manager with any changes in client status as provided to Advisor by the client and review

the quarterly statements provided by the third party money manager. Advisor will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the third party money manager. Clients placed with third party money managers will be billed in accordance with the third party money manager's fee schedule which will be disclosed to the client prior to signing an agreement. This is detailed in Item 10 of this brochure.

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### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

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### **Wrap Fee Programs**

Advisor does not sponsor any wrap fee programs.

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### **Client Assets under Management**

Advisor does not manage client assets.

## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

Advisor bases its fees on fixed fees and solicitor fees from third party money managers.

#### FINANCIAL PLANNING and CONSULTING

Financial Planning Services are offered based on a fixed fee of \$650 based on complexity and unique client needs. The fees are negotiable. Prior to the planning process the client will be provided an estimated plan fee. Lower fees for comparable services may be available from other sources. Half of the fee is due upon engagement and signing of the agreement with the remainder of the fee due upon delivery of the plan.

Client may cancel within five (5) days of signing Agreement for a full refund. If the client cancels after five (5) days, any unearned, prepaid fees will be refunded to the client based on the percentage of work completed.

#### SOLICITOR FEES

Advisor has entered into a Solicitor Agreement with Gradient Investments, LLC ("GI") a Registered Investment Advisor registered with the Securities and Exchange Commission to provide investment portfolio advice and supervisory services.

The relationship between Advisor and the Third Party Money Manager will be disclosed to the client in writing prior to commencement of the services. This agreement will include the name of the assisting investment advisor representative, the name of the third party money manager, the nature of the relationship and affiliation if any, a statement of compensation and amount, the terms of the compensation arrangement, and any additional fee(s) charged to clients above the normal fee of the third party money manager as a result of retaining the third party money manager through Advisor.

#### Gradient Investments, LLC ("GI") – Firm CRD #141726; Firm SEC #801-70812

GI offers an actively managed program of mutual fund and stock portfolios. The fee will be disclosed to the client in the Investment Advisory Agreement and are negotiable. The

clients fee for these services will be based on a percentage of assets under management as follows:

<b>Fee Schedule for: Strategic &amp; Tactical Portfolios</b>			
Assets Valuation	Maximum Annual Advisory Fee	GI Retention	Advisor Retention
Up to \$1,000,000	1.75%	.50%	1.25%
\$1,000,001-\$2,000,000	1.50%	.50%	1.00%
\$2,000,001 - \$3,000,000	1.20%	.50%	.70%
Over \$3,000,000	.95%	.45%	.50%

<b>Fee Schedule For: Allocation Portfolios</b>			
Assets Valuation	Maximum Annual Advisory Fee	GI Retention	Advisor Retention
Up to \$1,000,000	1.70%	.50%	1.20%
\$1,000,001-\$2,000,000	1.35%	.50%	.85%
\$2,000,001-\$3,000,000	1.00%	.50%	.50%
Over \$3,000,000	.80%	.40%	.40%

<b>Fee Schedule For: Preservation Portfolios</b>			
Assets Valuation	Maximum Annual Advisory Fee	GI Retention	Advisor Retention
All Assets	1.00%	.40%	.60%

<b>Fee Schedule for: Client Directed Accounts</b>			
Assets Valuation	Maximum Annual Advisory Fee*	GI Retention	Advisor Retention
All Values	.60%	.30%	.30%

\*The minimum quarterly fee billed will be \$25

GI will assist in the opening, closing and transferring of accounts. GI will provide institutional and 3rd party reports on securities held in the account and investment analysis via email or via phone when requested. GI will liquidate and purchase securities per the client's request. GI will also provide administrative services per the client's written request such as: ACH, check writing, RMD servicing. GI will provide consolidated household performance reporting on these accounts which are combined with any GI managed accounts.

The above fees are negotiable. Fees are assessed quarterly in arrears based on the amount of the assets managed as of the end of the previous quarter. All management fees are withdrawn from the client's account unless otherwise noted. GI will receive written

authorization from the client to deduct advisory fees from their account held by a qualified custodian. GI will pay Advisor their share of the fees. Advisor does not have access to deduct client fees. Clients may terminate their account within five business days of signing the investment advisory agreement with no obligation. For terminations after the initial five business days, GI will be entitled to a pro-rata fee for the days service was provided in the final quarter. GI will pay Advisor their portion of the final fee.

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### **Client Payment of Fees**

Fees for financial plans are due half at the time of signing the agreement with the balance due upon delivery of the plan. All plans are delivered inside of thirty (30) days.

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### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations).

Advisor, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

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### **Prepayment of Client Fees**

Financial Plans are billed 50% in advance. Client may cancel at any time for a full refund.

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### **External Compensation for the Sale of Securities to Clients**

Advisor does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Advisor.

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## **Item 6: Performance-Based Fees and Side-by-Side Management**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Advisor does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## **Item 7: Types of Clients**

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### **Description**

Advisor generally provides investment advice to individuals and high net worth individuals.

Client relationships vary in scope and length of service.

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**Account Minimums**

Advisor does not require a minimum to open an account, however Gradient Investments, LLC, the third party money manager utilized by Advisor has minimum asset requirements as set forward in its Form ADV Part 2A.

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

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**Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

When creating a financial plan, Advisor utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a financial plan for a client, Advisor's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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**Investment Strategy**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies utilized by the third party money managers may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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**Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Advisor:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## Item 9: Disciplinary Information

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

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

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### **Broker-Dealer or Representative Registration**

Neither Advisor nor any of its employees are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither Advisor nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

President Edward Guanill has a financial industry affiliated business as an insurance agent with Guanill Insurance Brokers, Inc. Approximately 50% of his time is spent in this business, he will offer clients advice or products from those activities. As an insurance agent, he may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

This practice represents a conflict of interest because it gives Mr. Guanill an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

The firm has relationships with unaffiliated third party professionals (law firms, CPA firms and/or real estate businesses) that it may refer clients to for services. These professionals are unrelated to Guanill Wealth Management, Inc. No compensation is exchanged for these potential referrals. When referring clients to these professionals, Mr. Guanill will keep the best interests of the clients first. Clients are not required to utilize these professionals, they are merely referred for convenience purposes.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Advisor solicits the services of Third Party Money Managers to manage client accounts. In such circumstances, Advisor receives solicitor fees from the Third Party Manager. This situation creates a conflict of interest. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the client's best interest first and will act accordingly. When referring clients to a third party money manager, the client's best interest will be the main determining factor of Advisor. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services are based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule is attached to Exhibit C in Advisor's Investment Advisory Agreement.

Prior to referring any clients to third party advisors, Advisor will make sure they are properly licensed or notice filed with the Department of Business Oversight.

This solicitor relationship is disclosed to the client in each contract between Advisor and Third Party Money Manager. Advisor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client initials Advisor 's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

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

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### **Code of Ethics Description**

The employees of Advisor have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Advisor employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Advisor. The Code reflects Advisor and its supervised persons’ responsibility to act in the best interest of their client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Advisor’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Advisor may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Advisor’s Code is based on the guiding principle that the interests of the client are our top priority. Advisor’s officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Advisor and its employees do not recommend to clients securities in which we have a material financial interest.

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

Advisor and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is Edward Guanill. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees

does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Advisor does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is Edward Guanill. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

Advisor does not recommend the use of a particular broker-dealer. Clients pay for any and all custodial fees in addition to the advisory fee charged by Advisor.

- *Directed Brokerage*  
Advisor utilizes Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.
- *Best Execution*  
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees. Advisor does not exercise discretion of client accounts.
- *Soft Dollar Arrangements*  
Advisor does not maintain any soft dollar arrangements.

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### **Aggregating Securities Transactions for Client Accounts**

Advisor does not trade for its or its clients' accounts and therefore aggregation of securities transactions is not applicable.

## **Item 13: Review of Accounts**

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by Edward Guanill, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

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### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Third Party Money Manager's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Client should carefully compare any reports and/or invoices received to the statements sent by the custodian. Client should report any discrepancies to Advisor immediately.

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

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### **Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

Advisor receives a portion of the annual management fees collected by the Third Party Money Managers to whom Advisor refers clients.

This situation creates a conflict of interest because Advisor and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher solicitor fees to be received by Advisor. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Advisor.

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### **Advisory Firm Payments for Client Referrals**

Advisor does not compensate for client referrals.

## **Item 15: Custody**

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by the Third Party Money Managers.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

Advisor does not accept discretionary authority to manage securities accounts on behalf of clients.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

Advisor does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent. Advisor may answer client questions regarding proxy-voting matters in an effort to assist the client in determining how to vote the proxy. However, the final decision of how to vote the proxy rests with the client. Any conflict of interest will be disclosed to the client.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because Advisor does not serve as a custodian for client funds or securities and Advisor does not require prepayment of fees of more than \$500 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Advisor has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither Advisor nor its management has had any bankruptcy petitions in the last ten years.

## **Item 19: Requirements for State Registered Advisors**

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### **Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

### **Outside Business Activities**

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

### **Performance Based Fee Description**

Advisor does not receive any performance based fees.

### **Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

No management persons of Advisor have any disclosures to report.

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**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

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**Material Conflicts of Interest Assurance**

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

ITEM 1 COVER LETTER  
**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

**Edward Guanill**



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Website: [EdGWealth.com](http://EdGWealth.com)

This brochure supplement provides information about Edward Guanill and supplements the Guanill Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Edward Guanill if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Edward Guanill (CRD# 6019874) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**SEPTEMBER 30, 2020**

## Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

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### Principal Executive Officer

#### Edward S. Guanill

- Year of Birth: 1971
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### Item 2 Educational Background and Business Experience

#### Educational Background:

- California State University-Sacramento; Bachelor of Arts – Communication Studies/Public Relations; 1999

#### Business Experience:

- Guanill Wealth Management, Inc. dba Guanill Wealth Management; President/Investment Advisor Representative; 08/2015 – Present
  - Guanill Insurance Brokers, Inc.; formerly Guanill Wealth Management & Insurance Services, Inc.; President/Insurance Agent; 08/2006 – Present
  - Springer Financial Advisors; Investment Advisor Representative; 08/2016 – 03/2017
  - Retirement Wealth Advisors, Inc.; Investment Advisor Representative; 09/2014 – 10/2015
  - Springer Financial Advisors; Investment Advisor Representative; 03/2013 – 09/2014
  - Springer Financial Advisors; Financial Advisor; 02/2012 – 03/2013
  - Jr. Asset Management & Real Estate Services; Loan Officer; 08/2003 – 08/2006
  - TL Financial; General Manager; 07/2003 – 08/2006
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### Item 3 Disciplinary Information

*Criminal or Civil Action:* None to report.

*Administrative Proceeding:* None to report.

*Self-Regulatory Proceeding:* 03/2012 - State of California Department of Insurance; Insurance license restricted; matter resolved 07/2012, ordered to reimburse insurance commissioner for costs in examining respondent's conduct in this matter.

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### Item 4 Other Business Activities

President Edward Guanill has a financial industry affiliated business as an insurance agent with Guanill Insurance Brokers, Inc. Approximately 50% of his time is spent in this business, he will offer clients advice or products from those activities. As an insurance agent, he may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

This practice represents a conflict of interest because it gives Mr. Guanill an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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**Item 5 Additional Compensation**

Edward Guanill receives additional compensation as an insurance agent and as an investment advisor representative, but does not receive any performance based fees.

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**Item 6 Supervision**

As owner and Chief Compliance officer of the firm, Edward Guanill is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

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**Item 7 Requirements for State-Registered Advisors**

*Arbitration Claims:* None to report.

*Self-Regulatory Organization or Administrative Proceeding:* 03/2012 - State of California Department of Insurance; Insurance license restricted; matter resolved 07/2012, ordered to reimburse insurance commissioner for costs in examining respondent's conduct in this matter.

*Bankruptcy Petition:* None to report.