

Guide Wealth Management, LLC
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Form ADV Part 2A – Firm Brochure

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This Brochure provides information about the qualifications and business practices of Guide Wealth Management, LLC, “GWM”. If you have any questions about the contents of this Brochure, please contact us at 833-222-9435. 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 Wealth Management, LLC is registered as an Investment Adviser with the State of New York and the District of Columbia. Registration of an Investment Adviser does not imply any level of skill or training. Additional information about GWM is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number (CRD#) 264788.

Item 2: Material Changes

Our fee model has changed to using assets under management (AUM) with a client-specific minimum fee. Details are found in Item 5: Fees and Compensation. No changes to fees will be made without proper notice and signed agreement from our clients.

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Item 4: Advisory Business

Description of Advisory Firm

Guide Wealth Management LLC (GWM) is a Registered Investment Advisor firm located in New York and the District of Columbia. We were founded in May 2015. Matthew Hague is the principal owner of GWM. We were founded in May 2015. Matthew Hague is the principal owner of GWM. As of August 14th, 2020, GWM manages \$10728665 on a discretionary basis.

Types of Advisory Services

Investment Management Services

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 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.

Wealth Management

We define Wealth Management as a comprehensive, multi-family office service. It includes Investment Management, Financial Planning, Tax Preparation and Representation. These may cover both Personal and Business topics, as outlined in the scope of our agreement.

Financial planning services include topics such as tax planning, retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning. Financial planning is 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 financial planning 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.

Additional Information

All fees are negotiable and may be adjusted at the discretion of the Principal, including offering a Pro Bono service which may offer the same, or a subsection of, services offered to paying clients.

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 Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to 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 sponsor 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.

Investment Management Services

Our standard investment management fee schedule is listed below of the market value of the assets under management (AUM). If the fee calculated using the AUM method is below our agreed minimum fee (as explained overleaf) then no AUM fees will be charged, and the minimum fee will be paid by the client.

Once AUM based fees exceed the client minimum fee, AUM based fees will be used solely, and the client minimum fee will not be charged.

Portfolio Value	Fee
\$0- \$3,000,000	0.95%
\$3,000,000 - \$6,000,000	0.75%
Above \$6,000,000	0.55%

The annual fees are negotiable and are paid in advance on a monthly or quarterly basis. There is no minimum fee for Investment Management Services. Fees are tiered, as such a client with \$4,000,000 in assets would be charged a blended rate equivalent to 0.90%

No increase in the annual fee structure shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts, or the client may choose to pay directly by check or credit card (a service fee may apply). Accounts initiated or terminated during a calendar month will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the client.

Wealth Management Services

Wealth Management Services are a comprehensive, family office solution. They include a combination of Financial Planning (both Personal and Business) and Investment Management. Fees for Wealth Management are calculated from a combination of complexity, income and net worth. Wealth Management clients do not pay an additional fee for Investment Management, and also receive Tax Preparation and Representation services with the IRS.

Client Minimum Fees

Wealth Management clients have a client-specific minimum fee that incorporates the fees from Investment Management, along with fees calculated based on income, complexity, and scope of work. This minimum fee is in effect until such time as the fee derived from assets under management fee exceeds the minimum fee. Clients are charged the greater of the two fees, they are not additive.

Clients can expect an annual increase to the minimum fee of between 0-3%. Fee increases will occur in January, with the first increase occurring in the first January after 12 months have elapsed from the initial contract.

CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

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 may also render such services to Businesses, Trusts, Estates, Charitable Organizations and Pension or Profit Sharing Plans.

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, cyclical and passive investing.

Passive Investment Management. We primarily practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds. In addition, we implement strategies that may weigh into certain factors, such as size, which may provide results that differ from the benchmark market, this has been described as Smart Beta.

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.

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.

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.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow

received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

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 clients 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 GWM or the integrity of our management. No employee of GWM has been subject to any disciplinary event.

Item 10: Other Financial Industry Activities and Affiliations

No GWM employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. No GWM employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor. GWM does not have any related parties. As a result, we do not have a relationship with any related parties.

GWM only receives compensation directly from clients. We do not receive compensation from any outside source.

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.

GWM, as a firm, has reviewed and accepted to abide by the Code of Ethics of several professional groups, including the CFP® Board, NAPFA, and the CFA Institute.

Our firm and its “related persons” (associates, their immediate family members, etc.) may buy or sell securities the same as, similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Compliance with Department of Labor (DOL) Fiduciary Rule

GWM acts as a level-fee fiduciary and abides by the Impartial Conduct Standards as defined by the DOL. GWM maintains a compensation structure that does not vary due to security selection and is considered reasonable under the meaning of ERISA 408(b)2 and IRC Section 4975(d)2.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Guide Wealth Management, LLC seeks the best available custodian for our client assets, considering a number of factors:

1. Financial condition and reputation.
2. Costs of doing business
3. Ability to execute timely and accurate trades.
4. Research services provided.
5. Custody and recordkeeping services.
6. Technology integration.

Based on the above, we have currently selected TD Ameritrade and Interactive Brokers as custodians. We review custodians periodically.

Research and Other Soft-Dollar Benefits

We do not intentionally participate in any Soft-Dollar benefit program, however, it is possible that our custodians may offer access to third party research or tools which may meet this criteria. At this time we do not consider any such services as material to our custodial selection.

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.

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 broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients' money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

When practical, we will combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Matthew Hague, Principal and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. 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.

GWM will provide written reports to Investment Management clients on a quarterly basis. We urge clients to compare these reports against the account statements they receive from their custodian.

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

GWM does not accept custody of client funds. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains the client's investment assets. We urge our clients to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client account in which GWM directly debits their advisory fee:

- i. GWM will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to GWM, permitting them to be paid directly for their accounts held by the custodian.

Item 16: Investment Discretion

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

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 \$1,200 in fees per client six months in advance.

Item 19: Requirements for State- Registered Advisers

Matthew Hague, CFP®, EA, Born: 1976

Educational Background

- 1999 – Business Information Technology, University of Wales
- 2014 – Certificate in Financial Planning, NYU

Business Experience

- 05/2015 – Present, Guide Wealth Management, LLC, Principal and CCO
- 12/2012 – 06/2014, Zensho Consulting Group, Partner
- 01/2006 – 11/2012, Adept Group, Managing Director
- 01/2001 – 12/2005, Carnival Corporation, Assistant Manager

Professional Designations, Licensing & Exams

- **CFP® (Certified Financial Planner) ®**: CFP® certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. They must pass a comprehensive CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

- **EA (Enrolled Agent)** Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years. Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights.

Other Business

Matthew Hague is the founder and Principal of Guide Tax Management, which provides Tax Preparation, compliance, and consulting services. This company does tax preparation work seasonally, as well as tax advising and some bookkeeping consulting. The business is not investment related. Between January and April 15th, Mr. Hague will spend 30% of his time providing tax preparation and planning services, with about half of this time during trading hours and half after trading hours.

Any fees charged by Guide Tax Management for work performed for a client of Guide Wealth Management will reduce the fee due to Guide Wealth Management.

Performance Based Fees

GWM is not compensated by performance-based fees.

Material Disciplinary Disclosures

No employee at Guide Wealth Management, 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

Guide Wealth Management, LLC, nor Matthew Hague, have any relationship or arrangement with issuers of securities.

Form ADV Part 2B – Brochure Supplement

Matthew Hague, CFP®, EA Principal and CCO, born 1976

This brochure supplement provides information about Matthew Hague that supplements the Guide Wealth Management, LLC (“GWM”) brochure. A copy of that brochure precedes this supplement. Please contact Matthew Hague if the GWM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Item 2: Educational Background and Business Experience

See ADV Part 2A Item 19

Item 3: Disciplinary Information

No employee at Guide Wealth Management, 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.

Item 5: Additional Compensation

Matthew Hague does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GWM.

Item 6: Supervision

Matthew Hague, as Principal and Chief Compliance Officer of GWM, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

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