

Item 1

Cover Page

# GuideStream Financial, Inc.

SEC File Number: 801 – 70418

ADV Part 2A, Firm Brochure

Dated: March 7, 2023

Contact: Daniel A. Kurtz, Chief Compliance Officer

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**This Brochure provides information about the qualifications and business practices of GuideStream Financial, Inc. (“GuideStream Financial”). If you have any questions about the contents of this Brochure, please contact us at (517) 750-2727. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about GuideStream Financial, Inc. also is available on the SEC’s website at [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov).**

**References herein to GuideStream Financial, Inc. as a “registered investment advisor” or any reference to being “registered” does not imply a certain level of skill or training.**

## **Item 2           Material Changes**

Since its Annual Amendment filing on March 8, 2022, GuideStream Financial has made the following material changes to its Form ADV Disclosure Statement:

- Item 4 – Updated disclosure to reflect that GuideStream Financial provides services to Institutional Clients.
- Item 4 – Updated to disclose that GuideStream Financial may offer Interval Funds to its clients including the risks and limitations associated with Interval Funds.
- Item 5 – Added fee schedule for Institutional Clients.
- Item 5 – Added disclosure of additional asset-based fee charged by Pershing LLC.
- Item 5 – Updated stand-alone financial planning and consulting fee range.

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## Item 4      **Advisory Business**

- A. GuideStream Financial is a corporation formed on June 22, 2009 in the state of Michigan. GuideStream Financial became registered as an Investment Advisor Firm on August 24, 2009. GuideStream Financial is owned by The Free Methodist Foundation. Mark Steven Olson is GuideStream Financial's President.

B.

### **INVESTMENT ADVISORY SERVICES**

GuideStream Financial provides discretionary and non-discretionary investment advisory services on a *fee* basis as discussed at Item 5 below. Before engaging GuideStream Financial to provide investment advisors services, clients are required to enter into an *Investment Advisory Agreement* with GuideStream Financial setting for the terms and conditions of the engagement, including termination, describing the scope of the services to be provided, and the fee that is due from the client.

GuideStream Financial also provides discretionary only investment advisory services to "Institutional Clients", i.e., endowments, charities, churches, non-profit organizations, pension plans and other faith-based organizations, who generally have an investment timeline of at least five to seven years on a fee basis as discussed at Item 5 below.

To commence the investment advisory process, GuideStream Financial will ascertain each client's investment objective(s) and then allocate the client's assets consistent with the client's designated investment objective(s). Once allocated, GuideStream Financial provides ongoing supervision of the account(s).

GuideStream Financial's annual investment advisory fee shall include investment advisory services, and, to the extent specifically requested by the client, financial planning and consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of GuideStream Financial), GuideStream Financial may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

GuideStream Financial may provide financial planning and/or consulting services on a stand-alone separate fee basis to clients who have not engaged GuideStream Financial to provide investment management services. Prior to engaging GuideStream Financial to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* with GuideStream Financial setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to GuideStream Financial commencing services.

If requested by the client, GuideStream Financial may recommend the services of other professionals for implementation purposes, including certain representatives of GuideStream Financial in their separate capacities as licensed insurance agents. (*See* disclosure at Items 5 and 10 below). The commission compensation earned by an insurance agency and its agents is separate from, and in addition to, GuideStream Financial's investment advisory fee. The recommendation by GuideStream Financial that a client

consider the purchase of an insurance product from an insurance agency presents a ***conflict of interest***, as the potential receipt of an insurance commission compensation by the insurance agency and its agent(s) may provide an incentive for the GuideStream Financial to recommend insurance products based on compensation to be received by representative rather than on a particular client's needs. To minimize the conflict, all commissions received by the individual shall be donated to a benevolent charitable fund. The representative's insurance services are not material to GuideStream Financial's advisory operations. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from GuideStream Financial.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e., attorney, accountant, insurance agent, etc.), and not GuideStream Financial, shall be responsible for the quality and competency of the services provided.

Each client is advised that it remains the client's responsibility to promptly notify GuideStream Financial if there is ever any change in client's financial situation or investment objectives for the purpose of reviewing, evaluating or revising GuideStream Financial's previous recommendations and/or services.

#### MISCELLANEOUS

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** As indicated above, to the extent requested by a client, GuideStream Financial may provide financial planning and related consulting services. Neither GuideStream Financial nor its investment adviser representatives assist clients with the implementation of any financial plan unless they have agreed to do so in writing. GuideStream Financial does not monitor a client's financial plan, and it is the client's responsibility to revisit the financial plan with GuideStream Financial, if desired. GuideStream Financial believes that it is important for the client to address financial planning issues on an ongoing basis. GuideStream Financial's advisory fee, as set forth at Item 5 below, will remain the same regardless of whether or not the client determines to address financial planning issues with GuideStream Financial.

Furthermore, GuideStream Financial does not serve as a law firm or accounting firm, and no portion of its services should be construed as legal or accounting services. Accordingly, GuideStream Financial does not prepare estate planning documents or tax returns. To the extent requested by a client, GuideStream Financial may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.), including certain representatives of GuideStream Financial in their separate individual capacities as licensed insurance agents.

The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from GuideStream Financial and/or its representatives.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e., attorney, accountant, insurance agent, etc.), and not GuideStream Financial, shall be responsible for the quality and competency of the services provided.

**Retirement Plan Rollovers – No Obligation / Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer’s plan, if permitted, (ii) roll over the assets to the new employer’s plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account (“IRA”), or (iv) cash out the account value (which could, depending upon the client’s age, result in adverse tax consequences). If GuideStream Financial recommends that a client roll over their retirement plan assets into an account to be managed by GuideStream Financial, such a recommendation creates a conflict of interest if GuideStream Financial will earn new (or increase its current) compensation as a result of the rollover. If GuideStream Financial provides a recommendation as to whether a client should engage in a rollover or not (whether it is from an employer’s plan or an existing IRA), GuideStream Financial is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by GuideStream Financial. GuideStream Financial’s Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

**Fiduciary Status:** Per the Department of Labor: “When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.” Accordingly, relative to retirement accounts, “we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.”

**The Free Methodist Foundation d/b/a/ FM Financial (Conflict of Interest).** GuideStream Financial is wholly owned by The Free Methodist Foundation d/b/a/ FM Financial (“FMF”), which is a subsidiary of the Free Methodist Church USA. GuideStream Financial and FMF share commonality of officers, directors and employees. FMF serves in a trustee capacity. FMF is an exempt corporate trustee under state law (religious organization). Certain clients for whom FMF may serve as Trustee may also have a

separate investment advisory relationship with GuideStream Financial. Neither GuideStream Financial nor FMF maintains physical custody of any client advisory funds or Trust funds.

In addition, GuideStream Financial's President, Mark S. Olson, is also the President of FMF and oversees the Free Methodist Investment and Loan Fund (the "Fund") and Joshua D. Adams is the Vice President of the Fund and reporting to Mr. Olson. The Fund is a church extension fund into which members, contributors and participants of the Free Methodist Church may invest, including clients of GuideStream Financial.

No portion of Fund principal is guaranteed by any governmental authority, including, but not limited to, the Federal Deposit Insurance Corporation ("FDIC").

GuideStream Financial does not exercise any discretionary authority to place any client assets into the Fund, nor does GuideStream Financial provide any investment advisory services to the Fund.

GuideStream Financial does not recommend that any client invest in the Fund, and does not receive referral fees, commissions, or any form of compensation from the Fund. Clients who request information from GuideStream Financial about the Fund will be directed to an FMF employee who does not provide investment advice on behalf of GuideStream Financial.

A complete discussion of the Fund is set forth in the Fund's subscription documents, which are provided directly by FMF to each prospective investor for review and consideration. Each prospective investor will generally be required to complete an Investment Application, pursuant to which the investor shall acknowledge and accept the various risk factors that are associated with an investment in the Fund.

Based on the relationship between GuideStream Financial and FMF, an introduction to the Fund by GuideStream Financial presents a conflict of interest, because an investment in the Fund provides funds that may be loaned at a margin, which benefits FMF. It remains the client's decision whether or not to invest in the Fund. **GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding this arrangement.**

#### **GuideStream Charitable Gift Fund d/b/a Legacy Charitable (Conflict of Interest)**

GuideStream Charitable Gift Fund d/b/a Legacy Charitable (the "Gift Fund") is a separate 501(c)(3) public charity. When a client chooses to engage GuideStream Financial for financial planning services, a plan may include a charitable giving component. If the client wishes to include charitable giving in their plan, the Gift Fund may be presented as a potential option for fulfillment of the charitable component of the plan.

Although it shares a common name, GuideStream Financial does not manage the Gift Fund or operate the Gift Fund. The Gift Fund is a tax-exempt fund into which individuals may choose to contribute to further their charitable endeavors, including clients of GuideStream Financial.

The Gift Fund has not been approved by any regulatory authority, nor is any portion of the Gift Fund principal guaranteed by any regulatory authority, including but not limited to the

FDIC. The Gift Fund is subject to an annual certified audit. GuideStream Financial does not exercise any discretionary authority to place any client assets into the Gift Fund, nor does GuideStream Financial provide any investment advisory services to the Gift Fund. GuideStream Financial does not receive referral fees, commissions or any form of compensation from the Gift Fund.

Clients who request information from GuideStream Financial about the Gift Fund will be directed to a Gift Fund employee. It remains the client's decision whether or not to donate to the Gift Fund. FMF provides administrative services to the Gift Fund, and, in the past, has been partially reimbursed by the Gift Fund for such services. The relationship between the Gift Fund, GuideStream Financial and FMF presents conflicts of interest as Mr. Olson also serves as the CEO of the Gift Fund and FMF will receive additional fees for the services it provides to the Gift Fund. Clients are therefore reminded that they are under no obligation whatsoever to contribute to the Gift Fund, and that they may contribute to any other unaffiliated charitable fund.

A complete discussion of the Gift Fund is set forth in the Gift Fund's program description and related documents, which will be provided directly by the Gift Fund to each prospective donor for review and consideration. Each prospective donor will generally be required to complete a Donor Application Form. **GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding this arrangement.**

**Use of Mutual and Exchange Traded Funds:** GuideStream Financial utilizes mutual funds and exchange traded funds for its client portfolios. In addition to Guide Stream Financial's investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses). Most mutual funds and exchange traded funds are available directly to the public. Therefore, a prospective client may be able to obtain many of the funds that may be utilized by GuideStream Financial, independent of engaging GuideStream Financial as an investment advisor.

However, if a prospective client determines to do so, he/she may not be able to access certain institutional class shares which may be accessible to GuideStream Financial's clients. Nor will he/she receive GuideStream Financial's initial and ongoing investment advisory services.

**Interval Funds/Risks and Limitations:** Where appropriate, GuideStream Financial, Inc. ("GuideStream Financial") may utilize interval funds. An interval fund is a non-traditional type of closed-end mutual fund that periodically offers to buy back a percentage of outstanding shares from shareholders. Investments in an interval fund involve additional risk, including lack of liquidity and restrictions on withdrawals. During any time periods outside of the specified repurchase offer window(s), investors will be unable to sell their shares of the interval fund. There is no assurance that an investor will be able to tender shares when or in the amount desired. There can also be situations where an interval fund has a limited amount of capacity to repurchase shares, and may not be able to fulfill all purchase orders. In addition, the eventual sale price for the interval fund could be less than the interval fund value on the date that the sale was requested. While an interval fund periodically offers to repurchase a portion of its securities, there is no guarantee that investors may sell their shares at any given time or in the desired amount. As interval funds can expose investors to liquidity risk, investors should consider interval fund shares to be

an illiquid investment. Typically, the interval funds are not listed on any securities exchange and are not publicly traded. Thus, there is no secondary market for the fund's shares. Because these types of investments involve certain additional risk, these funds will only be utilized when consistent with a client's investment objectives, individual situation, suitability, tolerance for risk and liquidity needs. Investment should be avoided where an investor has a short-term investing horizon and/or cannot bear the loss of some, or all, of the investment. There can be **no assurance** that an interval fund investment will prove profitable or successful. **In light of these enhanced risks, a client may direct GuideStream Financial, in writing, not to employ any or all such strategies for the client's account.**

**Short-Term Trading Fees.** GuideStream Financial is not a short-term trader. It manages investment assets consistent with the client's long-term investment objective. Some of the mutual funds utilized by GuideStream Financial impose a short-term trading fee (generally \$50 for funds held less than 30 days). If a client requires a distribution, GuideStream Financial, whenever possible, shall first seek to liquidate funds that either do not assess a short-term trading fee or whose short-term trading fee has expired.

**Cash Positions.** GuideStream Financial continues to treat cash as an asset class. As such, unless determined to the contrary by GuideStream Financial, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating GuideStream Financial's advisory fee unless otherwise agreed to in writing. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), GuideStream Financial may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, GuideStream Financial's advisory fee could exceed the interest paid by the client's money market fund. However, GuideStream Financial, in its sole discretion, may charge a lesser investment management fee on cash positions maintained in a client's account.

**Other Assets.** To the extent that the Registrant provides advisory monitoring or review services for client investment assets for which the Registrant does not maintain custodian access or trading authority (including initial and ongoing consideration of such assets as part of the client's asset allocation), the Registrant may determine to include such assets in its advisory fee calculation per Item 5 below.

**Cybersecurity Risk.** The information technology systems and networks that Registrant and its third-party service providers use to provide services to Registrant's clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in Registrant's operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and Registrant are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although Registrant has established its systems to reduce the risk of cybersecurity incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that Registrant does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified



custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

**Portfolio Activity.** GuideStream Financial has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, GuideStream Financial will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when GuideStream Financial determines that changes to a client's portfolio are neither necessary nor prudent. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

**Socially Responsible Investing Limitations.** Socially Responsible Investing involves the incorporation of Environmental, Social and Governance ("ESG") considerations into the investment due diligence process. There are potential limitations associated with allocating a portion of an investment portfolio in qualifying ESG securities (i.e., securities that have a mandate to avoid, when possible, investments in such products as alcohol, tobacco, gambling, pornography, abortion, etc.). The number of these securities may be limited when compared to those that do not maintain such a mandate. ESG securities could underperform broad market indices. Investors must accept these limitations, including potential for underperformance. Correspondingly, the number of ESG mutual funds and exchange traded funds are fewer when compared to those that do not maintain such a mandate. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by GuideStream), there can be no assurance that investment in ESG securities or funds will be profitable or prove successful.

**Non-Discretionary Service Limitations.** Clients that determine to engage GuideStream Financial on a non-discretionary investment advisory basis must be willing to accept that GuideStream Financial cannot effect any account transactions without obtaining prior consent to such transaction(s) from the client. Therefore, in the event that GuideStream Financial would like to make a transaction for a client's account (including in the event of an individual holding or general market correction), and the client is unavailable, GuideStream Financial will be unable to effect the account transaction(s) (as it would for its discretionary clients) without first obtaining the client's consent.

**Borrowing Against Assets/Risks.** A client who has a need to borrow money could determine to do so by using:

- **Margin-**The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral or
- **Pledged Assets Loan-** In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges its investment assets held at the account custodian as collateral;

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing

account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e. custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, GuideStream Financial does not recommend such borrowing unless it is for specific short-term purposes (i.e. a bridge loan to purchase a new residence). GuideStream Financial does not recommend such borrowing for investment purposes (i.e. to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to GuideStream Financial:

- by taking the loan rather than liquidating assets in the client's account, GuideStream Financial continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by GuideStream Financial, GuideStream Financial will receive an advisory fee on the invested amount; and,
- if GuideStream Financial's advisory fee is based upon the higher margined account value (*see* margin disclosure at Item 5 below), GuideStream Financial will earn a correspondingly higher advisory fee. This could provide GuideStream Financial with a disincentive to encourage the client to discontinue the use of margin.

**Please Note:** The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loans.

**Client Obligations.** In performing its services, GuideStream Financial shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify GuideStream Financial if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising GuideStream Financial's previous recommendations and/or services.

**Disclosure Brochure.** A copy of GuideStream Financial's written Privacy Notice, written Brochure as set forth on Part 2 of Form ADV and Form CRS (Client Relationship Summary) shall be provided to each client prior to, or contemporaneously with, the execution of an advisory agreement.

**Please Note: Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by GuideStream Financial) will be profitable or equal any specific performance level(s).

- C. GuideStream Financial shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment advisor representative will ascertain each client's investment objective(s). Thereafter, GuideStream Financial shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on GuideStream Financial's services.

- D. GuideStream Financial does not participate in a wrap fee program.
- E. As of December 31, 2022, GuideStream Financial had \$158,004,418 in assets under management on a discretionary basis and \$7,124,153 in assets under management on a non-discretionary basis for a total of \$165,128,571.

**Item 5 Fees and Compensation**

A.

**INVESTMENT ADVISORY SERVICES**

GuideStream Financial’s annual investment advisory fee shall be based upon a percentage (%) of the market value, based upon the custodial valuation, and type of assets placed under GuideStream Financial’s management.

GuideStream Financial’s fee will be prorated and charged on a monthly basis, in arrears, as follows:

<u>Market Value of Portfolio</u>	<u>Annual Fee %</u>
\$1 to \$250,000	1.09%
\$250,001 to \$1,000,000	0.94%
Over \$1,000,000	0.59%

Institutional clients are subject to the following fee schedule which, is also prorated and charged on a monthly basis, in arrears:

<u>Market Value of Portfolio</u>	<u>Annual Fee %</u>
From \$1 to \$1,000,000	0.75%
From \$1,000,001 to \$10,000,000	0.40%
Amount over \$10,000,000	0.10%

Institutional Clients do not receive Financial Planning services as described in Item 4 above.

GuideStream Financial’s policy is to treat intra-month account additions and withdrawals equally unless indicated to the contrary on GuideStream Financial’s Investment Advisory Agreement executed by its retail and institutional clients. Since its fees are calculated on the average daily value of the client’s account, additions and withdrawals will impact the fee charged. Additionally, GuideStream Financial bills on cash in the client’s account as well as the outstanding margin value. GuideStream Financial’s investment advisory fee may be negotiable at its discretion, depending upon objective and subjective factors including but not limited to: the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; future earning capacity; anticipated future additional assets; the professional(s) rendering the service(s); prior relationships with GuideStream Financial and/or its representatives, and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees, the services to be provided by GuideStream Financial to any particular client could be available from other advisers at

lower fees, and certain clients may have fees different than those specifically set forth above

**Margin Accounts: Risks/Conflict of Interest.** GuideStream Financial **does not** recommend the use of margin for investment purposes. A *margin account* is a brokerage *account* that allows investors to borrow money to buy securities and/or for other non-investment borrowing purposes. The broker/custodian charges the investor interest for the right to borrow money and uses the securities as collateral. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. Should a client determine to use margin, GuideStream Financial will include the entire market value of the margined assets when computing its advisory fee. Accordingly, GuideStream Financial's fee shall be based upon a higher margined account value, resulting in GuideStream Financial earning a correspondingly higher advisory fee. As a result, the potential of conflict of interest arises since GuideStream Financial may have an economic disincentive to recommend that the client terminate the use of margin. **Please Note:** The use of margin can cause significant adverse financial consequences in the event of a market correction. **ANY QUESTIONS: Our Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding the use of margin.**

#### FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

GuideStream Financial may provide financial planning and/or consulting services, including investment and non-investment related matters, on a stand-alone separate fee basis to clients who have not engaged GuideStream Financial to provide investment management services. GuideStream Financial's planning and consulting fees are negotiable but will be normally based on a rate of \$175 per hour and will generally range from \$500 to \$4,500, depending upon the level and scope of the services required and the professionals rendering the service.

- B. Clients may elect to have GuideStream Financial's advisory fees deducted from their custodial account. Both GuideStream Financial's *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of GuideStream Financial's investment advisory fee and to directly remit that management fee to GuideStream Financial in compliance with regulatory procedures.

In the limited event that GuideStream Financial bills the client directly, payment is due upon receipt of GuideStream Financial's invoice. GuideStream Financial shall deduct fees and/or bill clients monthly in arrears, based upon the average daily market value of the assets during the previous month.

- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, GuideStream Financial shall generally recommend that Pershing, LLC ("*Pershing*") serve as the broker-dealer/custodian for client investment management assets.

Broker-dealers such as *Pershing* generally charge brokerage commissions and/or transaction fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the

broker-dealer/custodian. While certain custodians, including *Pershing*, generally (with the potential exception for large orders) do not currently charge fees on individual equity transactions (including ETFs), others do. There can be no assurance that *Pershing* will not change their transaction fee pricing in the future. *Pershing* may also assess fees to clients who elect to receive trade confirmations and account statements by regular mail rather than electronically. GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding the above.

However, GuideStream Financial has negotiated an asset-based fee with *Pershing*, currently 0.03% (0.03%=three one hundredths of 1%) for client accounts (which clients acknowledge, in writing). The asset-based fee is calculated based on each client's assets placed under *Pershing's* custody and is payable by the client to cover brokerage and transaction fees in client accounts maintained with *Pershing*. *Pershing* debits the fee directly from each client's account. The 0.03% deducted by *Pershing* is in addition to the GuideStream Financial's advisory fee. GuideStream Financial does not receive any portion of the fee paid to *Pershing*.

*Pershing* also charges clients \$75.00 for closing certain types of accounts. In addition, *Pershing* may charge other fees as warranted by particular circumstances.

In addition to GuideStream Financial's investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees, transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian. These fees/charges are in addition to GuideStream Financial's investment advisory fee described above. GuideStream Financial does not receive any portion of these fees/charges.

- D. GuideStream Financial's annual investment advisory fee shall be prorated and paid monthly, in arrears, based upon the average daily market value of the assets during the previous month.

The *Investment Advisory Agreement* between GuideStream Financial and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, GuideStream Financial shall debit the account for the pro-rated portion of the unpaid advisory fee based upon the number of days that services were provided during the billing month.

- E. Neither GuideStream Financial, nor its representatives, accepts compensation from the sale of securities. However, if requested by the client, GuideStream Financial may recommend the services of certain of its representatives in their separate capacities as licensed insurance agents as an accommodation to specific client need. (Reference disclosure in Item 10.) The commission compensation earned by its agents is separate from, and in addition to, GuideStream Financial's investment advisory fee. The recommendation by GuideStream Financial that a client consider the purchase of an insurance product from an insurance agency presents a ***conflict of interest***, as the potential receipt of an insurance commission compensation by the insurance agency and its agent(s) may provide an incentive for the

GuideStream Financial to recommend insurance products based on compensation to be received by representative rather than on a particular client's needs.

**ANY QUESTIONS:** GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

GuideStream Financial, is not a party to any performance or incentive-related compensation arrangements with its clients.

## **Item 7 Types of Clients**

GuideStream Financial's clients shall generally include individuals, business entities, trusts, estates, charitable organizations and pension and profit-sharing plans.

GuideStream Financial may require an annual minimum fee of \$250 or a minimum asset level of \$25,000 for investment advisory services. Certain 403(b) accounts will not be subject to the annual minimum fee based upon the nature of the account. However, GuideStream Financial, in its sole discretion, waive or reduce its minimum fee or asset requirement based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). As a result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

- A. GuideStream Financial may utilize the following methods of security analysis and strategies when implementing investment advice given to clients:
- Apply provisions of an Investment Policy that contains the details to define, implement and manage a specific strategy.
  - Identify time horizons.
  - Identify risk levels.
  - Identify a target investment return intended to meet the investment objectives based on historical data and present data forecasts for each particular strategy
  - Select asset classes appropriate for the identified time horizon, risk level and return objective.
  - Select investments in ETFs, index funds or mutual funds within each asset class appropriate for the identified time horizon, risk level and return objective.

**Investment Risk.** Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by GuideStream Financial) will be profitable or equal any specific performance level(s).

- B. GuideStream Financial's methods of analysis and investment strategies do not present any significant or unusual risks.

GuideStream Financial's primary investment strategy - Long Term Purchases – is a fundamental investment strategy. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop.

Every method of analysis has its own inherent risks. To perform an accurate market analysis GuideStream Financial must have access to current/new market information. GuideStream Financial has no control over the dissemination rate of market information. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

**Margin Accounts-**GuideStream Financial **does not** recommend the use of margin. However, should a client determine to use margin, GuideStream Financial will include the entire market value of the margined assets when computing its advisory fee. Accordingly, GuideStream Financial's fee shall be based upon a higher margined account value, resulting in GuideStream Financial earning a correspondingly higher advisory fee. As a result, this presents a conflict of interest since GuideStream Financial has an economic disincentive to recommend that the client terminate the use of margin.

To supplement the specific risk disclosures provided throughout this Brochure, the following provides a short description of some of the risks associated with the types of investments to which GuideStream Financial allocates client investment assets:

**Market Risk.** The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors (such as economic or political factors) but may also be incurred because of a security's specific underlying investments. Additionally, each security's price can fluctuate based on market movement, which may or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.

**Mutual Fund Risk.** Mutual funds are operated by investment companies that raise money from shareholders and invests it in stocks, bonds, and/or other types of securities. Each fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. Mutual funds charge a separate management fee for their services, so the returns on mutual funds are reduced by the costs to manage the funds. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market. Mutual funds that are sold through brokers are called load funds, and those sold to investors directly from the fund companies are

called no-load funds. Mutual funds come in many varieties. Some invest aggressively for capital appreciation, while others are conservative and are designed to generate income for shareholders. 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).

Exchange Traded Fund Risk. ETFs are marketable securities that are designed to track, before fees and expenses, the performance or returns of a relevant index, commodity, bonds or basket of assets, like an index fund. Unlike mutual funds, ETFs trade like common stock on a stock exchange. ETFs experience price changes throughout the day as they are bought and sold. In addition to the general risks of investing, there are specific risks to consider with respect to an investment in ETFs, including, but not limited to: (i) the price of an ETF may or may not fluctuate with the price of the underlying securities that make up the fund; (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.

- C. Currently, GuideStream Financial primarily allocates client investment assets among various individual equity (stocks), debt (bonds), and fixed income securities, mutual funds and/or exchange traded funds and separately managed accounts on a discretionary basis in accordance with the client's designated investment objective(s).

## **Item 9            Disciplinary Information**

GuideStream Financial has not been the subject of any disciplinary actions.

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

- A. Neither GuideStream Financial, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither GuideStream Financial, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. As indicated at Item 4 above, GuideStream Financial does not serve as an attorney, accountant, or insurance agent, and no portion of our services should be construed as same. Accordingly, GuideStream Financial does not prepare legal documents, prepare tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.), including:

Licensed Insurance Agents. Certain representatives of GuideStream Financial, in their separate individual capacities as licensed insurance agents, may be engaged to provide insurance products on an accommodation basis for GuideStream Financial's clients. If the client engages certain representatives of GuideStream Financial's in their separate



individual capacities as licensed insurance agents, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged professional[s], and **not** GuideStream Financial shall be responsible for the quality and competency of the services provided. Neither GuideStream Financial nor its representative hold themselves out as providing insurance services to the general public. To minimize the conflict, all commissions received by the individual shall be donated to a benevolent charitable fund. The representative's insurance services are not material to GuideStream Financial's advisory operations.

The recommendation by GuideStream Financial that a client purchase an insurance commission product through a related person presents a conflict of interest, as the receipt of commissions, though mitigated in this circumstance, may provide an incentive to recommend investment products based on commissions, rather than on a particular client's need. No client is under any obligation to purchase any commission products from GuideStream Financial's representatives. Clients may purchase insurance commission products recommended by GuideStream Financial through other, non-affiliated insurance agents/agencies. **GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding the above conflicts of interest.**

- D. GuideStream Financial does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. GuideStream Financial maintains an investment policy relative to personal securities transactions. This investment policy is part of GuideStream Financial's overall Code of Ethics, which serves to establish a standard of business conduct for all of GuideStream Financial's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisors Act of 1940, GuideStream Financial also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by GuideStream Financial or any person associated with GuideStream Financial.

- B. Neither GuideStream Financial nor any related person of GuideStream Financial recommends, buys, or sells for client accounts, securities in which GuideStream Financial or any related person of GuideStream Financial has a material financial interest.
- C. GuideStream Financial and/or representatives of GuideStream Financial *may* buy or sell securities that are also recommended to clients. This practice may create a situation where GuideStream Financial and/or representatives of GuideStream Financial are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest.

GuideStream Financial has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of GuideStream Financial's "Access Persons." GuideStream Financial's securities transaction policy requires that an Access Person of GuideStream Financial must provide the Chief Compliance Officer or

his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date GuideStream Financial selects; provided, however that at any time that GuideStream Financial has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. GuideStream Financial and/or representatives of GuideStream Financial *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where GuideStream Financial and/or representatives of GuideStream Financial are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11.C, GuideStream Financial has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of GuideStream Financial's Access Persons.

## **Item 12 Brokerage Practices**

- A. In the event that the client requests that GuideStream Financial recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct GuideStream Financial to use a specific broker-dealer/custodian), GuideStream Financial generally recommends that investment management accounts be maintained at *Pershing*. Prior to engaging GuideStream Financial to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with GuideStream Financial setting forth the terms and conditions under which GuideStream Financial shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that GuideStream Financial considers in recommending *Pershing* (or any other broker-dealer/custodian to clients) include historical relationship with GuideStream Financial, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by GuideStream Financial's clients shall comply with GuideStream Financial's duty to seek best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where GuideStream Financial determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although GuideStream Financial will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, GuideStream Financial's investment management fee. GuideStream Financial's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Research and Benefits. Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, GuideStream Financial receives from *Pershing* (or another

broker-dealer/custodian, investment platform, unaffiliated investment manager, vendor, and/or product/fund sponsor) without cost (and/or at a discount) support services and/or products, certain of which assist GuideStream Financial to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by GuideStream Financial may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by GuideStream Financial in furtherance of its investment advisory business operations.

GuideStream Financial's clients do not pay more for investment transactions effected and/or assets maintained at Pershing as the result of this arrangement. There is no corresponding commitment made by GuideStream Financial to *Pershing* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interest.**

2. GuideStream Financial does not receive referrals from broker-dealers.
3. GuideStream Financial recommends that its clients utilize the brokerage and custodial services provided by Pershing. GuideStream Financial does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and GuideStream Financial will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by GuideStream Financial. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs GuideStream Financial to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through GuideStream Financial. Higher transaction costs adversely impact account performance.

Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

**GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have**

**regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.**

- B. To the extent that GuideStream Financial provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless GuideStream Financial decides to purchase or sell the same securities for several clients at approximately the same time. GuideStream Financial may (but is not obligated to) combine or “bunch” such orders to seek best execution, to negotiate more favorable commission rates or to allocate equitably among GuideStream Financial’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. GuideStream Financial shall not receive any additional compensation or remuneration as a result of such aggregation.

**Item 13      Review of Accounts**

- A. For those clients to whom GuideStream Financial provides investment supervisory services, account reviews are conducted on an ongoing basis by GuideStream Financial. All investment supervisory clients are advised that it remains their responsibility to advise GuideStream Financial of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with GuideStream Financial on an annual basis.
- B. GuideStream Financial may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided, at least quarterly, with transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. GuideStream Financial may also provide a written periodic report summarizing account activity and performance.

**Item 14      Client Referrals and Other Compensation**

- A. As referenced in Item 12 above, GuideStream Financial without cost (and/or at a discount), may receive support services and/or products from *Pershing*. GuideStream Financial’s clients do not pay more for investment transactions effected and/or assets maintained at *Pershing* (or any other institution) as result of this arrangement.

There is no corresponding commitment made by GuideStream Financial to *Pershing* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**GuideStream Financial’s Chief Compliance Officer, Daniel Kurtz, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.**

- B. Neither GuideStream Financial, nor any related person, compensates any non-supervised person for client referrals.

## **Item 15      Custody**

Clients typically grant GuideStream Financial the authority to debit its advisory fee from the client's account. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. GuideStream Financial may also provide a written periodic report summarizing account activity and performance. To the extent that GuideStream Financial provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by GuideStream Financial with the account statements received from the account custodian. The account custodian does not verify the accuracy of GuideStream Financial's advisory fee calculation.

In addition, GuideStream Financial engages in certain custody-related services and/or practices (i.e., trustee service, password possession, and asset transfer authorizations) that are disclosed at Item 9 of Part 1 of Form ADV. These services and practices are subject to an annual surprise CPA examination. GuideStream Financial is deemed to have custody of client funds or securities because certain investment adviser representatives of GuideStream Financial have agreed to client requests that they serve as trustees for the same client trusts that GuideStream Financial manages. GuideStream Financial also views itself as being deemed to have custody over certain client accounts if those clients are also income beneficiaries of a charitable trust for which FMF is trustee or of a gift annuity issued by FMF.

As described above in Item 4, GuideStream Financial's President, Mark S. Olson, is also the President of FMF and oversees the Free Methodist Investment and Loan Fund (the "Fund"). GuideStream Financial does not exercise any discretionary authority to place any client assets into the Fund, nor does GuideStream Financial provide any investment advisory services to the Fund. GuideStream Financial does not believe that it is deemed to have custody over the Fund's assets or any client assets invested in the Fund, because its advisory services are separate and distinct from the charitable endeavors of FMF and the Fund.

However, there is significant overlap between GuideStream Financial's management personnel and FMF's management personnel who have access to the Fund in their separate capacities. Therefore, even though GuideStream Financial does not view itself as being deemed to have custody over Fund's assets or any client assets invested in the Fund, there are safeguards to protect clients' investments in the Fund. In that respect, the Fund is subject to an annual audit and investors receive the audited financial statements as part of the annual offering circular.

**ANY QUESTIONS: GuideStream Financial's Chief Compliance Officer, Daniel Kurtz, remains available to address any questions that a client or prospective client may have regarding custody-related issues.**

## **Item 16 Investment Discretion**

The client can determine to engage GuideStream Financial to provide investment advisory services on a discretionary basis. Prior to GuideStream Financial assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming GuideStream Financial as the client's attorney and agent in fact, granting GuideStream Financial full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage GuideStream Financial on a discretionary basis may, at any time, impose restrictions, in writing, on GuideStream Financial's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe GuideStream Financial's use of margin, etc.).

## **Item 17 Voting Client Securities**

Unless a client directs otherwise, in writing, GuideStream Financial votes client proxies. However, the client shall maintain exclusive responsibility for all legal proceedings or other type events pertaining to the assets, including, but not limited to, class action lawsuits. GuideStream Financial and/or the client shall correspondingly instruct each custodian of the assets to forward to GuideStream Financial copies of all proxies and shareholder communications relating to the assets. Absent mitigating circumstances and/or conflicts of interest (to the extent any such circumstance or conflict is presented, if ever, information pertaining to how GuideStream Financial addressed any such circumstance or conflict shall be maintained by GuideStream Financial), it is GuideStream Financial's general policy to vote proxies in conjunction with the services provided by, and consistent with the recommendations of Broadridge Investor Communications Solutions ("Broadridge"). GuideStream Financial has retained the services of Broadridge, an independent proxy-voting service provider, to provide research, recommendations, and other proxy voting services for client Proxies. Absent a determination by GuideStream Financial to override Broadridge's guidelines and/or recommendations, GuideStream will vote all client Proxies in accordance with Broadridge guidelines and recommendations which, per their policies, vote all proxies in the best economic interest of our clients. With regard to Taft-Hartley clients, GuideStream Financial has retained Broadridge, at no cost to the client, to vote all proxies in accordance with AFL-CIO Guidelines for Voting Proxies which by definition is in the best interests of the client.

GuideStream Financial (in conjunction with the services provided by Broadridge) shall monitor corporate actions of individual issuers and investment companies consistent with GuideStream Financial's fiduciary duty to vote proxies in the best interests of its clients. With respect to individual issuers, GuideStream Financial may be solicited to vote on matters including corporate governance, adoption or amendments to compensation plans (including stock options), and matters involving social issues and corporate responsibility. With respect to investment companies (e.g., mutual funds), GuideStream Financial may be solicited to vote on matters including the approval of advisory contracts, distribution plans, and mergers. GuideStream Financial (in conjunction with the services provided by Broadridge) shall maintain records pertaining to proxy voting as required pursuant to Rule 204-2 (c)(2) under the Advisors Act. Copies of Rules 206(4)-6 and 204-2(c)(2) are

available upon written request. In addition, information pertaining to how GuideStream Financial voted on any specific proxy issue is also available upon written request. Requests should be made by contacting GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz.

**Item 18      Financial Information**

- A. GuideStream Financial does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. GuideStream Financial is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. GuideStream Financial has not been the subject of a bankruptcy petition.

**GuideStream Financial's Chief Compliance Officer, Daniel A. Kurtz, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**