

# FORM ADV PART 2A DISCLOSURE BROCHURE



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This brochure provides information about the qualifications and business practices of Asset Guidance Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 404-348- 4120. 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 Asset Guidance Group, LLC (CRD #291448) is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**APRIL 24, 2023**

## **Item 2: Material Changes**

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### **Annual Update**

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

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

Amended Filing include the following:

- Changes to third-party manager section and procedures the Firms will use in the best interests of clients in the event of emergency or catastrophe in order to provide continuity of service and risk management in the event of need for an immediate succession plan for the Firm.
  - Update as to amount of assets under management (AUM)
  - Technical change to add credentials of CFP® Professional for Wallace Nichols.
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### **Full Brochure Available**

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

**Item 3: Table of Contents**

**Form ADV – Part 2A – Firm Brochure**

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## Item 4: Advisory Business

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### Firm Description

Asset Guidance Group, LLC ("AGG") was founded in 2012 and used as a dba for investment advisor representative services and for insurance purposes. In 2017 AGG applied for registration as a registered investment advisor. Wallace R Nichols is 100% owner as the Managing Member and founding principal.

AGG is a fee-based financial planning and investment management firm. Wallace R Nichols and Jarod W Nichols also offer insurance services and products through AGG. AGG offers to sell annuities, insurance, or other commissioned products.

AGG does not act as a custodian of Client assets.

An evaluation of each Client's initial situation is provided to the Client, often in the form of a net worth statement, risk analysis, risk-reduction report, or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the Client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the Client in the event they should occur.

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### Types of Advisory Services

#### ASSET MANAGEMENT

AGG offers discretionary and non-discretionary asset management services to advisory Clients. AGG will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize AGG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

#### Discretionary

When the Client provides AGG discretionary authority the Client will sign a limited trading authorization or equivalent. AGG will have the authority to execute transactions in the account without seeking Client approval on each transaction.

#### Non-discretionary

When the Client elects to use AGG on a non-discretionary basis, AGG will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, AGG will obtain prior Client approval on each and every transaction before executing any transaction.

#### PRIVATE PLACEMENTS

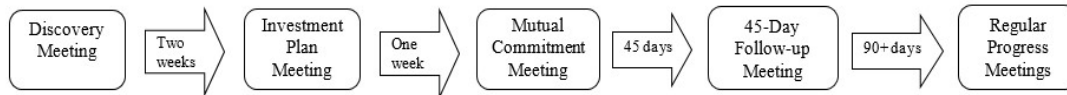
AGG may provide investment advice and due diligence about certain privately-issued securities for those Clients who represent they are accredited investors and who otherwise meet certain investor standards. (To qualify as an accredited investor, you must have a net worth, not including your primary residence of at least \$1 million; or have an income exceeding \$200,000 in each of the two most recent years or joint income with a spouse exceeding \$300,000 for those years and a reasonable expectation of the same income level in the current year.) AGG will collect all available information—marketing materials, auditing reports, balance sheets, offering memorandum, subscription agreement, review historical records and access opportunities and risks for investment now and for the years ahead. Prepare and seek answers to relevant due diligent questions. Interview manager and/or make site visit. Consider the time horizon and the sponsor's strength over an extended period. Due diligence will continue throughout the duration of the investment. AGG will meet with the Client at least on an annual basis for the duration of the investment.

The fees for these services will be included as part of the client's portfolio and will be included as part of the Asset Management section in Item 5 of this brochure.

#### FINANCIAL PLANNING

If financial planning services are applicable, AGG will make a thorough review of all applicable topics including but not limited to: Investments, Taxes, Qualified Plans, Roth Conversions, Insurance, Retirement Income Planning, Social Security, Education, and Wills, Estate Plans and Trusts. If a conflict of interest exists between the interests of AGG and the interests of the Client, the Client is under no obligation to act upon AGG's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to implement the transaction through AGG. Financial plans will be offered via an annual subscription agreement, paid in twelve (12) equal monthly payments, with fees earned upon receipt. AGG will complete and deliver planning on an on-going basis as set forth in the general process below. All planning milestones are contingent upon timely Client delivery of all required documentation.

AGG uses the following systematic consulting process for uncovering your most important goals and for designing and implementing appropriate solutions.



- 1. Discovery Meeting.** At our initial meeting, we conduct a discovery interview. This helps us identify the challenges you face in achieving all that is important to you. We examine your current situation, the goals you would like to achieve and how we can maximize the possibility of achieving those goals.
- 2. Investment Plan Meeting.** At this meeting, we present our diagnostic of your current situation and our recommendations for how we can bridge the gaps to increase the probabilities that you reach your goals. This plan forms the foundation for all our work together.
- 3. Mutual Commitment Meeting.** At this meeting, we are ready to make a mutual decision about whether our firm can add substantial value and whether we should proceed. Should we both choose to work together, we commit to each other to work toward achieving everything that is important to you and your family. We also execute the documents necessary to put your investment plan into motion.
- 4. 45-Day Follow-up Meeting.** When you have multiple investment accounts, it's easy to become overwhelmed with the amount of paperwork you receive. At this meeting, we help you organize all that paperwork in a notebook that we provide. We also answer any questions you may have so that you understand exactly what is happening with your money.
- 5. Regular Progress Meetings.** These meetings, which we schedule at intervals convenient to you, provide us an opportunity to review any major changes in your personal or financial situation since our last meeting. If these changes mean that we need to make adjustments to your investment plan, we do so. We also review your overall progress toward your long-term financial goals. This meeting is also our opportunity to implement advanced planning recommendations that may be appropriate for your situation. We will present to you our advanced plan at our first Regular Progress meeting so that we can prioritize those areas of greatest importance to you and then begin to address them systematically.

This consulting process serves as our framework, but it is only the beginning. To ensure that your family's most important financial issues are addressed as needed, we serve as your personal chief financial officer.

As your personal chief financial officer, we set the foundation of your financial house through this investment plan. Once this is in place, we address additional components of your financial picture as needed. With your wealth management plan to guide us, we focus on four broad areas of your financial life:

- 1. Wealth enhancement** aims to produce the best possible investment returns consistent with your level of risk tolerance and to minimize the tax impact on those returns.
- 2. Wealth transfer** intends to find and facilitate the most tax-efficient way to pass assets to succeeding generations, and to do so in a way that meets your wishes.
- 3. Wealth protection** is aimed at protecting your wealth against potential creditors, litigants, children's spouses and potential ex-spouses.
- 4. Charitable giving** helps fulfill your charitable goals. It is most effective when coordinated with the three services above.

In accordance with your stated priorities, we will raise these issues and make our recommendations to you during our Regular Progress Meetings. Over time, this allows us to address all of your advanced planning needs.

#### **Our Network of Professional Advisors**

To gain the precise expertise we need to serve as your personal chief financial officer and effectively manage all aspects of your financial affairs, we work with a network of professional advisors. These carefully selected professionals provide us with a high level of knowledge and skill in key aspects of your finances. As your wealth manager, we review your complete financial picture and identify any needs. As appropriate, we then turn to our network to evaluate your specific financial challenges and devise appropriate recommendations.

AGG'S PROPRIETARY TRADING MODELS

AGG offers its own proprietary trading models to manage a portion of, or the Client's entire portfolio, at the Client's discretion and choice. In such circumstances, AGG receives fees which are deducted from the Client's overall account amount by the applicable custodian housing the Client's trading accounts.

### THIRD PARTY MANAGERS

When deemed appropriate for the Client, AGG may recommend that Clients utilize the services of a Third-Party Manager ("TPM") to manage a portion of, or the Client's entire portfolio. All TPMs that AGG recommends must either be registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authority(ies).

After gathering information about your financial situation and objectives, an Associated Person of our firm will make recommendations regarding the suitability of a TPM or investment style based on, but not limited to, your financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPM, AGG will monitor the performance of the TPM to ensure their performance and investment style remains aligned with your investment goals and objectives.

In such circumstances, AGG receives solicitor fees from the TPM. AGG acts as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. AGG helps the Client complete the necessary paperwork of the TPM, provides ongoing services to the Client, will provide the TPM with any changes in Client status as provided to us by the Client and review the quarterly statements provided by the TPM. AGG will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM. Clients placed with TPM will be billed in accordance with the TPM's Fee Schedule which will be disclosed to the Client prior to signing an agreement.

### SEMINARS AND WORKSHOPS

AGG holds seminars webinars, and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. AGG may offer some seminars or webinars for a disclosed fee, please see Item 5. Most often, AGG offers such seminars through a 501(c)(3) non-profit organization named Center for Holistic Education in Retirement Planning, Inc. ("CHERP"). When AGG offers such seminars through CHERP, only generic information is provided for educational purposes to the general public. All client-specific recommendations are reserved for AGG's office consultations only and no client-specific information is solicited or discussed during such seminars.

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

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

Agreements may not be assigned without written Client consent.

### **Wrap Fee Programs**

AGG does not sponsor any wrap fee programs.

### **Client Assets under Management**

As of the date of filing this brochure, AGG provides advisory services, including planning, discretionary, and non-discretionary management services, in all associated planning, market, and insurance advisory and management platforms, for total Client assets approaching or exceeding \$25,000,000.

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

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

#### FINANCIAL PLANNING

Financial planning services are offered based on a flat fee ranging from \$100 to \$3,600. Although fees may be paid lump-sum at client discretion, AGG's standing practice is to offer tiered pricing of "Essential" for \$260/month; "Family Retirement" for \$315/month; and "Entrepreneur" for \$560/month. Due to the front-loaded nature of financial analysis, investment, and retirement planning, together with the reasonable comparatively low subscription rates, all monthly subscription fees are deemed earned upon receipt for a complete twelve (12) month period, or one (1) year. Fees for financial plans are due upon signing of the Strategic Planning and Investment Advisory Subscription Agreement.

Planning services are provided under each tiered-priced package as follows:

- Essential
  - Values and vision



- Budget and cash flow
- Tax projections
- Investment strategy
- Family Retirement
  - Retirement planning
  - College education funding
  - Social security maximization/optimization
  - Insurance planning
  - Investment strategy
  - Estate planning
  - Gifting strategies
  - Tax return analysis, optimization, and filing, if so desired, through our back-office collaboration colleagues
  - Access to legal and tax specialists
  - Plus everything in the Essential tier
- Entrepreneur
  - Exist and succession planning
  - Business continuation (buy/sell)
  - Cash flow and distribution planning
  - Key employee compensation
  - Valuation
  - Insurance audit
  - Legal audit
  - Asset protection strategies
  - Retirement plan creation and/or overview
  - Plus everything in Family Retirement tier.

Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client. AGG reserves the right to waive the fee should the Client implement the plan through AGG.

Services are completed and delivered in accordance with the AGG systematic consulting process set forth in Item 4 above, contingent upon timely Client delivery of all required documentation.

This monthly subscription fee includes charges for Client access to a secure financial planning portal which allows Client to see Client's entire wealth scenario on a real-time basis. Client is also provided a secure Vault in which Client may store and share vital, confidential information by simply uploading files instead of transmitting them via email.

Fees paid for financial planning do not obligate the Client to move investment assets to AGG and the Strategic Planning and Investment Advisory Subscription Agreement specifically excludes any such obligation as prerequisite for the Client engaging AGG purely for purposes of financial planning. AGG believes that the best way to provide unbiased advice in accordance with fiduciary obligations is by charging separate fees: one for financial planning and one for investment management.

During the financial planning process, representatives of AGG may provide Client with various insurance products upon which a commission or recurring assets under management ("AUM") fees may be paid to AGG's representatives, and such commissions are separate and apart from the fees charged under this Agreement should Client implement such recommendations. A conflict exists because of the relationship. This conflict is mitigated by disclosures, procedures and AGG's fiduciary obligation. The Client is under no obligation to act upon the investment advisor's recommendations. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through AGG or its representatives.

## ASSET MANAGEMENT

AGG offers direct asset management services to advisory Clients. AGG charges an annual negotiable investment advisory fee not to exceed 2.0% based on the total assets under management.

The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed monthly in advance based on the amount of assets managed as of the close of business on the last business day of the previous month. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, unearned fees will be refunded to the Client. However, most frequently bills will be prorated based on the number of days earned during each month. All billing is based on a 360-day year. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

When AGG manages Client Assets, AGG's custodial trading platform TD-Ameritrade Institutional/Schwab (the two are in the process of a merger), will deduct fees from the client account and will pay AGG's fees monthly. In those instances, AGG's annual fees will be charged as follows:

<b>Assets Under Management</b>	<b>Annual Fee</b>
First \$10,000	2.0%
From \$10,000 - \$500,000	1.45%
Amount above \$500,000	1.0%

Annual fees are prorated (based on a 360-day year) to match the billing cycle. EXAMPLE: 1.45% annual billed quarterly would be 0.3625% per quarter; 1.45% billed monthly is 0.1208% per month. The 360-day daily prorated amount at 1.45% is 0.004% per day.

AGG will provide Clients thirty (30) days prior "negative notice"-written notice of any change in billing cycles. "Negative notice" means that such change as set forth in the written notice will go into effect absent a formal objection in writing submitted by Client before the expiration of such thirty (30) day period. The thirty (30) day period is measured by the date of the mailing of the correspondence, not the date such correspondence is received. In the event of a timely-submitted Client objection, AGG will honor such objection to the extent the custodian/billing administrator of funds will entertain such an exception. If the custodian objects, then Client will have to reconsider its objection and negotiate a resolution with AGG satisfactory to Client, which may include Client leaving that custodian's platform. Absent objection by the custodian/billing administrator, AGG will honor such objection subject to the objecting Client's acknowledgment and agreement that such objection will create additional administrative burdens on AGG and/or the custodian/billing administrator, compensation for which will be charged to the objecting Client as an additional administrative fee of \$62.50 per billing cycle requested by the objecting Client. To the extent the objecting Client does not agree to the additional administrative fee of \$62.50, then Client will have to reconsider its objection and negotiate a resolution with AGG satisfactory to Client, which may include termination of the Asset-Management relationship.

## THIRD PARTY MANAGERS

AGG does not routinely utilize the services of Third-Party Managers in the regular course of business. However, AGG has entered into Solicitor Agreements with Third-Party Managers as set forth below for the following reasons:

- Primarily to ensure continuity and appropriate risk-management for client asset allocations in the event AGG experiences a catastrophic or other type emergency event; and
- To provide additional benchmarks and sounding boards against which to measure AGG's proprietary research and performance against personally known and respected investment managers to ensure Clients are receiving the highest and best advice practicable under all circumstances.

## Zacks Investment Management

For the foregoing reasons, AGG has entered into a Solicitor Agreement with Zacks Investment Management, a Registered Investment Advisor under the Investment Advisors Act of 1940 and is a wholly owned subsidiary of Zacks Investment Research. (collectively, "Zacks"). Registration does not imply a certain level of skill or training. Zacks provides investment portfolio advice and supervisory services.

When utilized, AGG will receive use of Zacks' proprietary models in exchange for a payment of 23 basis points (1 basis point equals 1/100<sup>th</sup> of 1%). AGG pays such costs directly to Zacks as outlined in their solicitor agreement, based on the total amount of Assets Under Management each AGG Client using a Zacks model.

## SEMINARS AND WORKSHOPS

AGG holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. AGG may offer some seminars for a fee of \$49. Routinely, however, AGG offers such educational efforts through a 501(c)(3) non-profit organization CHERP, as more fully explained above in Item 4, under the heading of "Seminars and Workshops" on page 4 above.

### **Client Payment of Fees**

Investment management fees are billed monthly in advance. This term means that AGG invoices Clients through its custodian before the billing period. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account. A more thorough explanation of the billing process is set forth above on page 7 above under this same Item 5 under the heading, "Asset Management."

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

### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, bonds, equities, and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees.

In addition to the management fees based on market value of investments and securities, the investment advisory fee also includes a quarterly charge for Client access to a secure financial planning portal which allows a Client to see their entire wealth scenario on a real-time basis. Client is also provided a secure Vault in which Client may store and share vital, confidential information by simply uploading files instead of transmitting them via email. These charges may be adjusted from time to time based on rates charged by eMoneyAdvisor.com (wholly owned by Fidelity Investments) subject to the notice provision set forth herein. eMoney has long been considered best in brand by industry analysts for financial planning applications and software according to Financial Advisor Magazine.<sup>11</sup> AGG charges an annual fee of \$129.60 paid in monthly installments of \$10.80.

#### ***Clients Using Planning Services Only***

Clients using Planning Services only will pay the above-described monthly eMoney portal charge of \$10.80 as part and parcel of their monthly subscription fee. As such Clients are not paying for AUM fees, the above paragraphs in this section does not apply to Planning Services only Clients.

#### ***Clients Using Both Planning Services and Advisory Services***

Clients using both AUM services and Planning Services will pay only one fee for eMoney portal charges, that fee being part and parcel of the monthly subscription rate for Planning Services. Such Clients will not be double billed for the eMoney portal charges.

As more fully explained and previously set forth in this Item 5 under the heading, "Asset Management" on page 7 above, in the event a Client desires to have a billing cycle *other than that currently in place, generally monthly*, AGG may charge an additional \$62.50 as reasonable compensation for the extra administrative burdens in effectuating such client demands. Otherwise, the \$62.50 as described in Item 5 on page 7 above should be ignored here.

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

### **Prepayment of Client Fees**

Investment management fees are billed monthly in advance.

Financial planning fees will be due in accordance with and upon signing of the Strategic Planning and Investment Advisory Subscription Agreement.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to AGG.

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

AGG does not receive any external compensation for the sale of securities, including Structured Notes, to Clients, nor do any of the investment advisor representatives of AGG.

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

#### **Sharing of Capital Gains**

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

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

to the Client.

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

### **Description**

AGG generally provides investment advice to individuals, high net worth individuals, and business entities.

Client relationships vary in scope and length of service.

### **Account Minimums**

AGG does not require a minimum to open an account. However, some Client Account minimums may be determined by the TPMs in the event AGG refers its Clients to such managers.

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

### **Methods of Analysis**

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

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

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

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

### **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during intake meetings, consultations, strategy sessions and other Client correspondence and communications with AGG. The Client may change these objectives at any time by providing written notice to AGG. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, naked options, or spreading strategies).

### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with AGG:

- *Market Risk:* The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are

highly liquid, while real estate properties are not.

- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, 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 or (ii) 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. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *REIT Risk:* To the extent that a Client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk – the risk that your investment's return will not keep up with inflation.
- *Structured Notes:* Structured Notes("SNs") generally have the following characteristics:
  - Offered by large commercial banks, for purposes of example only, and not limited to, the following listed institutions:
    - Bank of Montreal
    - Barclay's
    - JP Morgan Chase
    - Citi
  - Sold in units of \$1,000

- Linked to an Underlier to measure performance
- May be FDIC insured
- Offers protection against downside risk using Buffers
- Has a stated term, e.g., 6 months, 18 months, etc.
- Call features
- 2 general types
  - Accumulation/growth
  - Income
- SNs mitigate Downside Risk Using Buffers

Buffer: A form of protection of an investor's Principal. The Buffer absorbs a fixed percentage of the Underlier's decline, after which the investor participates in the decline in the Underlier.

The SNs AGG generally offers have four different types of Buffers:

Hard Buffers: type of Buffer that absorbs a fixed percentage of the Underlier's loss and, after that, losses are one-to-one with the market. Hard Buffers are generally considered more conservative than Geared Buffers and Barriers.

Geared Buffers: A type of Buffer that absorbs a fixed percentage of the Underlier's decline, after which point losses are leveraged to the market (i.e., losses are more than one-to-one with the return of the market beyond the buffer). Geared Buffers are considered riskier than Hard Buffers with the same buffer amount, because the investor may lose full Principal in the event of a steep market downturn at maturity.

Deleveraged Buffers: A type of Buffer that absorbs a certain percentage of losses in the Underlier. Investors take losses at a rate that is less than one-to-one with losses in the Underlier.

Barriers: A type of Buffer that absorbs a fixed percentage of the Underlier's decline; however, if the Underlier declines beyond a specified level, the protection disappears, and losses are one-for-one from the Underlier's Initial Level. Barriers may be observed continuously, daily, or at maturity. Barriers are generally considered the riskiest type of Buffer associated with Structured Investments.

Observation Date: the date on which the Underlier is measured to see if the Buffer has been triggered. Generally, the "Buy Date" is the Initial Trade Date of the offering.

Underlier: All Structured Investments provide a return based on the performance of some reference asset or index to which the investment is linked. Popular Underliers include equities, commodities, interest rates, and currencies.

Market-Linked CD: A type of Structured Investment where the principal amount is insured by the FDIC, up to applicable limits, in the event of Issuer default. Market Linked CDs have the potential to earn more than traditional, fixed rate Certificates of Deposit because their returns are linked to the performance of an Underlier (e.g. S&P 500). However, the investor also foregoes potential interest received from a traditional CD to participate in the potential long-term growth and income.

SNs have the risk of 100% loss of principal when using a downside barrier which disappears if the underlier moves below the stated barrier percentage amount. For example, the stated barrier is 35% and the Client buys one (1) \$1,000 SN. The initial value of underlier is 100% on trading. Subsequently, the underlier's price falls 34%. The Client's principal balance is still worth \$1,000. Later, the underlier's price falls additionally such that it is now 36% below the underlier's initial price on the trade date. The barrier disappears and the value of the Client's principal is now \$640, the current percentage loss of the underlier. Client will be repaid the SN's value at maturity relative to the underlier's performance at maturity: e.g., if SN at maturity recovers to 90% relative to its initial value at trading, Client receives \$900 at maturity. On the other hand, if the SN recovers its full value, then client would receive its full \$1,000 initial investment.

- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading*: The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.
- *Private Equity/Placement Risk*: Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and

all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.

The risks associated with utilizing TPMs include:

- Manager Risk
  - The TPM fails to execute the stated investment strategy
- Business Risk
  - TPM has financial or regulatory problems
- The specific risks associated with the portfolios of the TPM's which is disclosed in the TPM's Form ADV Part 2.

The specific risks associated with financial planning include:

- Risk of Loss
  - Client fails to follow the recommendations of AGG resulting in loss
  - Client follows the recommendations of AGG resulting in loss
  - Client has changes in financial status or lifestyle and therefore plan recommendations are no longer valid

#### **Item 9: Disciplinary Information**

##### **Criminal or Civil Actions**

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

##### **Administrative Enforcement Proceedings**

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

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

AGG and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of AGG or the integrity of its management.

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

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

No affiliated representatives of AGG are registered representatives of a broker-dealer.

##### **Futures or Commodity Registration**

Neither AGG nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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

Managing Member, Wallace R Nichols is also a licensed insurance agent and sells insurance products and services through AGG. Approximately 50% of Wallace R Nichols' time is spent in this practice. He will offer Clients services from this activity.

Managing Member, Wallace R Nichols, is an Attorney at Law for WR Nichols Law, LLC. Mr. Nichols may offer this service to clients of AGG.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received or other compensation. These conflicts are mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or attorney of their choosing.

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

From time to time, as more fully explained and set forth in Item 5, page 8 above under the heading, "Third-Party Managers," AGG may solicit the services of TPMs to manage Client accounts. In such circumstances, AGG would receive solicitor fees from the TPM. AGG would act as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. AGG would be responsible for:

- helping the Client complete the necessary paperwork of the TPM;

- providing ongoing services to the Client;
- updating the TPM with any changes in Client status which is provide to AGG by the Client;
- reviewing the quarterly statements provided by the TPM; and
- delivering the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM to the Client.

Clients placed with TPMs will be billed in accordance with the TPM's fee schedule which will be disclosed to the Client prior to signing an agreement. When referring Clients to a TPM, the Client's best interest will be the main determining factor of AGG.

These practices represent conflicts of interest because AGG would be paid a Solicitor Fee for recommending the TPMs and may choose to recommend a particular TPM based on the fee AGG would receive. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to act in the best interest of its Clients. Clients are not required to accept any recommendation of TPMs given by AGG and have the option to receive investment advice through other money managers of their choosing.

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

##### **Code of Ethics Description**

The affiliated persons (affiliated persons include employees and/or independent contractors) of AGG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of AGG affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of AGG. The Code reflects AGG and its supervised persons' responsibility to act in the best interest of their Client.

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

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

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

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

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

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

AGG and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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

AGG and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide AGG with copies of their brokerage statements.

The Chief Compliance Officer of AGG is Wallace R Nichols. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over affiliated persons' transactions.

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

AGG does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. While AGG doesn't trade in its Clients' accounts, affiliated persons are required to disclose all reportable securities transactions as well as provide AGG with copies of their brokerage statements.



The Chief Compliance Officer of AGG is Wallace R Nichols. He reviews all affiliated persons trades each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over affiliated persons' transactions.

## **Item 12: Brokerage Practices**

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

AGG may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the Client's choosing. AGG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. AGG relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by AGG.

- *Directed Brokerage*  
In circumstances where a Client directs AGG to use a certain broker-dealer, AGG still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: AGG's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals.
- *Best Execution*  
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.
- *Soft Dollar Arrangements*  
The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by AGG from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, AGG receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of AGG. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when AGG receives soft dollars. This conflict is mitigated by the fact that AGG has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

AGG utilizes the services of custodial broker dealers. Economic benefits are received by AGG which would not be received if AGG did not give investment advice to Clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to AGG's accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

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

AGG is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of AGG. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

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

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

Account reviews are performed quarterly by the Chief Compliance Officer of AGG. Account reviews are performed more frequently when market conditions dictate.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, AGG suggests updating at least annually.

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

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

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

Clients receive written account statements no less than quarterly for managed accounts. Account statements are

issued by AGG's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

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

##### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

To the extent AGG would utilize a TPM (refer to Item 5 TPM heading on p8 above), AGG would receive a portion of the annual management fees collected by the TPM(s) to whom AGG refers Clients.

This situation would create a conflict of interest because AGG and/or its Investment Advisor Representative would have an incentive to decide what third-party money managers to use because of the higher solicitor fees to be received by AGG. However, when referring Clients to a TPM, the Client's best interest will be the main determining factor of AGG.

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

AGG may enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with AGG, that refer Clients to AGG in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a Client is introduced to AGG by a solicitor, AGG may pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon AGG's engagement of new Clients and is calculated using a varying percentage of the fees paid to AGG by such Clients. Any such fee shall be paid solely from AGG's investment management fee and shall not result in any additional charge to the Client.

Each prospective Client who is referred to AGG under such an arrangement will receive a copy of this brochure and a separate written disclosure document disclosing the nature of the relationship between the solicitor and AGG and the amount of compensation that will be paid by AGG to the solicitor. The solicitor is required to obtain the Client's signature acknowledging receipt of AGG's disclosure brochure and the solicitor's written disclosure statement.

#### **Item 15: Custody**

##### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by AGG.

AGG is deemed to have constructive custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of AGG.

#### **Item 16: Investment Discretion**

##### **Discretionary Authority for Trading**

AGG may require discretionary authority to manage securities accounts on behalf of Clients. AGG has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If applicable, Client will authorize AGG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

AGG allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to AGG in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. AGG does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

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

##### **Proxy Votes**

AGG does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, AGG will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

#### **Item 18: Financial Information**

##### **Balance Sheet**

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

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

AGG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

**Bankruptcy Petitions during the Past Ten Years**

AGG has not had any bankruptcy petitions in the last ten years

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

**Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).**

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

None to report.

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B



Wallace R Nichols, MBA, JD, CFP® Professional  
Jarod W Nichols, BA, IAR

This brochure supplement provides information about Wallace R Nichols and Jarod W Nichols and supplements the Asset Guidance Group, LLC's brochure. You should have received a copy of that brochure. Please contact Wallace R Nichols if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Wallace R Nichols (CRD #5988582, CFP® Professional #260236) and Jarod W Nichols (CRD #7529151) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**Website:**  
<https://assetguidancegroup.com>

**APRIL 24, 2023**

**Brochure Supplement (Part 2B of Form ADV)**

**Supervised Person Brochure**

**Principal Executive Officer – Wallace R Nichols, MBA, JD, CFP® Professional**

- Year of birth: 1959

**Item 2 - Educational Background and Business Experience**

Educational Background:

- UNM School of Law; Juris Doctor; 1992
- Texas Tech University; MBA – Statistics; 1987
- Angelo State University; BBA – Accounting; 1984

Business Experience:

- Asset Guidance Group, LLC; Investment Advisor Representative; 01/2018 – Present
- Asset Guidance Group, LLC; Managing Member/Insurance Agent; 01/2012 – Present
- WR Nichols & Associates, PC; Attorney at Law; 11/2007 - Present
- First American National Investment Advisors, LLC dba Asset Guidance Group, LLC; Investment Advisor Representative; 08/2016 – 12/2017
- Cetera Advisor Networks LLC; Investment Advisor Representative/Registered Representative; 09/2014 – 08/2016
- CSSC Investment Advisory Services, Inc.; Investment Advisor Representative; 11/2011 – 10/2014
- CSSC Brokerage Services, Inc.; Registered Representative; 10/2011 – 10/2014

**Item 3 - Disciplinary Information** *Criminal or*

*Civil Action:* None to report. *Administrative Proceeding:* None to report. *Self-Regulatory Proceeding:* None to report.

**Item 4 - Other Business Activities Engaged In**

Managing Member, Wallace R Nichols is also a licensed insurance agent and sells insurance products and services through AGG. Approximately 50% of Wallace R Nichols's time is spent in this practice. He will offer Clients services from this activity.

Managing Member, Wallace R Nichols, is an Attorney at Law for WRNichols Law, LLC. Mr. Nichols may offer this service to clients of AGG. Approximately less than 5% of his time is spent in this capacity.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received or other compensation. These conflicts are mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or attorney of their choosing.

**Item 5 - Additional Compensation**

Wallace R Nichols receives fees for financial planning, commissions on the insurance he sells and is compensated for his services as an Attorney at Law. He does not receive any performance-based fees.

**Item 6 - Supervision**

Wallace R Nichols is the Chief Compliance Officer at AGG and is also an investment adviser representative of AGG. He is ultimately responsible for all supervision, formulation, and monitoring of investment advice offered to Clients. He will ensure all firm members, agents, and investment advisors adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at: [wnichols@assetguidancegroup.com](mailto:wnichols@assetguidancegroup.com) or at: 404-348-4120; 678-480-9426.

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

*Arbitration Claims:* None to report.

*Self-Regulatory Organization or Administrative Proceeding:* None to report.

*Bankruptcy Petition:* None to report for the last 10 years.

## Supervised Person Brochure

### Investment Advisor – Jarod W Nichols, BA

- Year of birth: 1988

### Item 2 - Educational Background and Business Experience

#### Educational Background:

- Arizona State University; BA – Hugh Downs School of Communications; 2011
- Business Experience:
- Asset Guidance Group, LLC; Investment Advisor Representative; 03/2022 – Present
- Asset Guidance Group, LLC; Insurance Agent; 08/2021 – Present
- Asset Guidance Group, LLC; Staff; 07/2021 – 08/2021
- Shellpoint Mortgage Servicing; 02/2021 – 02/2020; Relationship Manager
- Ditech Financial; 10/2015 – 02/2020; Relationship Manager

### Item 3 - Disciplinary Information *Criminal or*

*Civil Action:* None to report. *Administrative*

*Proceeding:* None to report. *Self-Regulatory*

*Proceeding:* None to report.

### Item 4 - Other Business Activities Engaged In

Jarod W Nichols is also a licensed insurance agent and sells insurance products and services through AGG. Approximately 70% of Jarod W Nichols' time is spent in this practice. He will offer Clients services from this activity.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received or other compensation. These conflicts are mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or attorney of their choosing.

### Item 5 - Additional Compensation

Jarod W Nichols receives commissions on the insurance he sells. He does not receive any performance-based fees.

### Item 6 - Supervision

Wallace R Nichols is Chief Compliance Officer and is also an investment adviser representative of AGG. He is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will ensure all firm members, agents, and investment advisors adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at: [wnichols@assetguidancegroup.com](mailto:wnichols@assetguidancegroup.com) or at: 404- 348-4120.

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

*Arbitration Claims:* None to report.

*Self-Regulatory Organization or Administrative Proceeding:* None to report.

*Bankruptcy Petition:* None to report for the last 10 years.