

DISCLOSURE BROCHURE



Fee  Only
COMPREHENSIVE ADVICE, INDIVIDUAL SOLUTIONS

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Financial Guidance Group, Inc.

REGISTERED INVESTMENT ADVISOR

This Brochure provides information about the qualifications and business practices of Financial Guidance Group, Inc. If you have any questions about the contents of this brochure, please contact us at (727) 787-7526 or info@financialguidancegroup.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities administrator.

The term "registered investment advisor" does not mean that Financial Guidance Group, Inc. has attained a certain level of skill or training. It is used strictly to reference the fact that Financial Guidance Group, Inc. is "registered" as an "investment adviser" with the United States Securities and Exchange Commission and with such other regulatory agencies that may have regulatory jurisdiction over their business practices.

BROCHURE
DATED

1
JANUARY
2011

MATERIAL CHANGES

On July 28, 2010, the United State Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure dated January 1, 2011 is a new document and replaces our Disclosure Brochure dated February 15, 2010. This document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this page will summarize material changes made to our brochure. We will also reference the date of our last annual update of our brochure.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. In the future, we will send you a summary of material changes to our brochure by April 30 of each year. We will also offer to send you a free copy of our brochure. If there is any material information that could affect our relationship with you, even if it is not in our brochure, we will send it to you promptly.

In our last Brochure, we described a collaboration we had formed with Rudy Aguilera of Helios, LLC as an outside portfolio manager. Towards the end of 2010, Mr. Aguilera discontinued managing individual portfolios when he became Chief Investment Officer and Co-Portfolio Manager of the Ironclad Funds, a fully registered no-load mutual fund. We transitioned our clients' investments from Mr. Aguilera's direct management into the Ironclad Managed Risk Fund (IRONX). We no longer recommend brokersXpress, LLC for custody and brokerage since our clients no longer have a need to execute exchange-traded index option contracts to facilitate Mr. Aguilera's former management strategies.

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ADVISORY BUSINESS

Mission Statement

At Financial Guidance Group, our mission is to provide a superior level of customized, comprehensive, objective guidance to help you achieve your financial goals, simplify your financial life and provide peace of mind.

Business Focus

Financial Guidance Group, Inc. ("the Company"), owned by Carl von dem Bussche and founded in 1993, is a "fee only" registered investment advisor. "Fee only" advisors receive compensation for advice only. Our planning solutions are designed to address your economic health and well-being. Much like a doctor performing a physical exam, we will perform a complete financial physical that is comprehensive and completely customized.

Principally, in implementing our financial planning disciplines, we believe there are four sectors of your financial life that are sensitively linked. These four sectors are:

- ❖ **Income** – Employment, investment income, windfall/inheritance, social security, and pension income.
- ❖ **Household Expenses** – Housing, utilities, transportation, insurance, education, debt repayment, and other expenses including entertainment.
- ❖ **Assets** – Real estate, investments, other tangible property, and intangible property.
- ❖ **Liabilities** – Mortgage, credit card, automobile, and unsecured debt.

If the balance of these sectors is weighted too heavily in one direction, then the impending results might adversely affect your financial life. What we seek to do is examine your total financial situation to determine how any financial advice might impact the stability of these sectors, and then advise you based on the scenario most likely to prevent such imbalances from occurring. Consequently, the complex investment alternatives available to you are reduced to those investment options suited to maintain the desired balance.

Financial Planning

Successful financial planning is achieved by starting with a clear picture of your financial needs and objectives. The financial plans we develop helps us eliminate much of the guesswork in achieving the financial security and independence you desire by simplifying these financial alternatives. For you, such quality time invested by the Company on the front-end solves problems and provides solutions, eliminating future concerns and cultivates peace of mind.

Financial Planning Composition

Financial planning is an evaluation of the investment and financial options available based upon your defined economic criteria and financial goals. Planning includes: (i) attempting

to make optimal decisions; (ii) projecting the consequences of these decisions in the form of a financial plan – a working blueprint; (iii) implementing the protocol to achieve the objectives of the plan; and then, (iv) comparing future performance against the working blueprint.

A financial plan can be broad – a mutually defined review of your personal financial needs; or, segmented – review, analysis and evaluation of a core area of financial need. In general, financial planning encompasses one or more of the following areas of concern:

- ❖ **Personal** – Family records, budgeting, personal liability, estate information and financial goals.
- ❖ **Education** – Education IRAs, financial aid, State savings plans including 529 plans, grants and general assistance in preparing to meet dependents continuing educational needs through development of an education plan.
- ❖ **Taxes & Cash Flow** – Understanding the impact of various investments on your current income tax and future tax liability.
- ❖ **Death & Disability** – Cash needs at death, income needs of surviving dependents, estate planning and income analysis.
- ❖ **Estate** – Reviewing estate-planning documents, including wills and trusts, to determine if you should seek the assistance of an estate-planning attorney. Reviewing powers of attorney, nursing home and assisted living agreements, living trusts, and Medicare/Medicaid benefits.
- ❖ **Retirement** – Analysis of current strategies and investment plans to help you achieve retirement goals.
- ❖ **Investments** – Analysis of investment alternatives and their effect on your investment portfolio(s), including a risk and return analysis. Assessment of your risk tolerance profile.
- ❖ **Insurance** – Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.

Preparing the Financial Plan

We prepare the financial plan in three (3) stages. These stages are defined as follows:

Stage I – Detailed Assessment

We learn about you and what you want to achieve through a detailed assessment process. This is accomplished through personal interviews and profile questionnaires¹, which are designed to address all of the financial planning disciplines discussed above. You have the opportunity to prioritize objectives and goals and to remove from the process any areas that are not applicable to your circumstances.

The time we invest in the detailed assessment process to listen to you is critical for developing a strong financial planning foundation. Such time helps to:

¹ The profile questionnaires are important tools in gathering information about your investment methodology, risk tolerance, income/tax bracket, liquidity, time horizons, etc. If you elect not to answer the questionnaires or choose to respond with limited input, it is possible that we could operate in a handicapped capacity. Therefore, if you want the most effective and accurate recommendations, you will make every effort to provide us with detailed personal needs and objectives, along with detailed financial and tax information.

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- ❖ Define and narrow your goals, objectives and investment options;
 - ❖ Stimulate creative thinking;
 - ❖ Identify areas of greatest concern;
 - ❖ Create a unique picture of your overall financial personality; and,
 - ❖ Provide an effective and efficient way for us to address your unique financial needs and objectives.

After the interview process, we will prepare an agenda and meet with you to begin formally documenting goals and objectives. From this meeting, we will draft a report documenting the financial planning process disciplines that you want to address, and detailing the specific objectives under each discipline. Redrafting and meetings can be repeated until you are completely satisfied with the report. Depending upon the engagement, different levels of financial reporting will be undertaken. At a minimum, a statement of financial position, designed for financial planning use only, will be prepared.

State II – Personal Action Plan

We define the financial plan as a road map designed to take you from where you currently are financially, to where you want to be financially. This is the creative portion of the process. There are usually many different ways to accomplish a given goal. The objective, however, is to formulate a plan that you will be comfortable executing. In some cases, the drafting of the plan reveals the need for us to help you reconcile the gap between expectations and financial realities. Once a viable plan has been drafted, it is presented to and reviewed with you. The draft and review process may be repeated until you satisfied with the financial plan.

Stage III – On Target Reviews

A financial plan is of limited value if it is not put into action. Accordingly, we place a premium on implementing² and monitoring the plan. The implementation schedule provides a list of tasks and deadlines designed to ensure that you put the plan into action. The following are some examples of implementation: (i) drafting of appropriate estate documents (performed by an estate attorney); (ii) purchase of various insurance policies; (iii) investment advisory services, including preparation of a Client Investment Policy Statement and Profile and asset allocation strategy (performed by the Company, or another investment adviser/broker-dealer); (iv) adoption and monitoring of a personal budget; and, (v) ongoing income tax planning. We strongly suggest that you review the overall financial plan less than an annually. Investment advisory services are performed in accordance with the disclosures contained under "Investment Services" below.

² Implementing the recommendations made in a financial plan often requires consultation or coordination with one or more outside professionals (e.g. attorneys, CPAs, insurance and securities representatives). We will keep all information provided by you kept entirely confidential unless you authorize us to give your personal information to your outside professionals as well.

Portfolio Management

Our managed Model Portfolios are designed to build long-term wealth while maintaining risk tolerance and loss thresholds levels acceptable to you. With every Model Portfolio, we incorporate investment strategies that have been pre-determined from the investment parameters outlined in the Client Investment Policy Statement. Such investment strategies are made up of the four Model Portfolio strategies³:



Mainstay – The Mainstay model is our most conservative allocation. This portfolio is appropriate for investors who wish to preserve capital while providing for prudent growth and current income. Prospective investors include those nearing or in retirement or those who require significant withdrawals within a three to five-year timeframe.



Steadfast – The Steadfast portfolio is our moderate allocation. This portfolio is appropriate for investors who wish to grow assets in a prudent manner while providing current income and capital preservation as secondary objectives. Prospective investors include those nearing or in retirement or those who require significant withdrawals within a five to ten-year time frame.



Surveyor – The Surveyor model is our moderate-aggressive allocation. This portfolio is appropriate for investors who wish to grow assets with a minor emphasis on current income and capital preservation. Prospective investors include those who are 10+ years away from retirement or those who do not require significant withdrawals with a ten-year timeframe.



Explorer – The Explorer model is our most aggressive allocation. This portfolio is appropriate for investors who wish to grow assets without regard to current income and capital preservation. Prospective investors include those who are 15+ years away from retirement or those who do not require significant withdrawals within a ten-year time frame.

Portfolio Composition

Portfolio management services of the Model Portfolios primarily use equity (stock) and fixed-income (bond) exchange traded funds, index funds and no-load mutual funds that cover all the major asset classes. We have developed four model portfolio structures that are used as asset allocation guidelines in designing your portfolio. Each model consists of a different “target” asset allocation with different asset classes – spreading money among a variety of investments as opposed to investing in just one – creating a more prudent approach to managing risk.

The investment mix is designed to achieve your desired investment return. However, the selected investment vehicles in your portfolio are typically diversified into many investments

³ These models incorporate other investment vehicles, as described in “Portfolio Composition” below, which are used to achieve the investment objectives stated in each of the four investment strategies.

that are common to all client accounts. This is the only common denominator. From that point the composition mix and quantity of investments in any given client account is completely subjective.

Composition mix classifications include stocks, bonds, exchange traded funds, closed-end funds, exchange-traded master limited partnerships, unit investment trusts, REITS, and cash. The exact composition and allocation of investments are determined by your investment parameters, which can compose a more detailed and/or complex structure than the four Model Portfolio strategies as described above.

Ongoing, we manage your accounts on a discretionary basis where you grant us discretion to select the specific securities and amount of securities to be bought or sold and the timing of transactions. At your option, you may impose specified investment objectives and guidelines and/or conditions. For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of your portfolio or prohibit transactions in the securities of a specific industry. We ask that you detail in writing any specific requirements before engaging our services.

If one of your accounts is a plan subject to ERISA, we ask that you appoint the Company as "Investment Adviser" for purposes of ERISA. We will need to have copies of the trust agreement and any amendments governing the operation and administration of plan assets. We do not provide advice for assets outside of the plan and will not vote proxies for securities held in the plan. We ask that you take steps to name the Company as a fiduciary in the plan's ERISA fidelity bond covering the account.

We managed approximately \$66,200,000 in assets on a discretionary basis as of December 31, 2010. Generally, we do not manage on a non-discretionary basis.

FEES AND COMPENSATION

Financial Planning Fees & Termination

Our financial planning fees are based on the size, complexity, and nature of your personal and financial situation and the amount of time it will take to analyze and summarize the plan and perform the services desired by you for the year.

Comprehensive

All comprehensive financial planning services are offered on a fixed fee basis and will range from \$2,500.00 to \$10,000.00 for the initial engagement.⁴ The fee will be fully disclosed before you sign the Financial Planning Contract ("Agreement"). This Agreement will include the cost⁵ to review your financial information and prepare the comprehensive financial plan. One-half the fee will be due at the time the Agreement is signed, with the remaining half due upon completion.

⁴ Financial planning fees are generally not negotiated. Portfolio management fees may be negotiated.

⁵ Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract to perform a particular task and therefore will notify you of the additional cost prior to beginning such services.

Termination of Financial Planning Services

You will have five (5) business days to terminate the Agreement without charge. Should you wish to terminate the Agreement after such time and before presentation of the financial plan, we will be compensated through the date of termination for time spent in design of the financial plan at an hourly rate agreed to by both parties in the Agreement. After the financial plan has been completed and presented to you, termination of the Agreement is no longer an option.

Portfolio Management Fees & Termination

Our standard fee structure presents the annual percentage charged for portfolio management provided on an asset-based fee arrangement. The fee for a quarter is one fourth of the annual applicable percentages multiplied by the aggregate market value of the assets held in your account on the last regular trading day of each calendar quarter. The fee schedule is as follows:

Asset Management Fee Schedule

Account Balance	Annual Fee Rates
Up to \$1,000,000.....	1.15%
From \$1,000,001 – \$5,000,000.....	0.90%
Over \$5,000,001.....	0.65%

The Company requires a minimum of \$500,000 in assets to begin management services.

You are billed quarterly in advance based on the value of securities, plus cash and equivalents held in your account on March 31, June 30, September 30 and December 31, or the last regular trading day prior to these dates. For the first billing quarter, if your account is not opened at the beginning of a quarter, the fee is based upon a pro-rata calculation of the aggregate value of your assets.

When you sign the Investment Advisory Agreement, you will authorize the Company to invoice your custodian/brokerage firm for management fees. By signing a "Letter of Authorization" or other document, you will authorize your custodian/brokerage firm to automatically deduct the fees from your account and send to the Company. If your account does not have a sufficient cash or money market balance to cover the fees or is restricted from automatic debiting of fees, you may deposit additional funds (subject to certain restrictions for IRA accounts and qualified retirement plans) or make payment in an alternative manner acceptable to the Company. If you do not deposit additional funds or otherwise make the payment, securities in your account may be sold in an amount sufficient to cover the fees. Your account's custodian or broker/dealer will reflect the amount of the deduction on your account's statement. Such liquidation may affect the relative balances of the account.

Deposits and Withdrawals

You may make additions to their managed account at any time. Additional assets received in your managed account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the billing period.

For assets withdrawn by you, the Company has the option to refund any management fees on a pro-rata basis. Withdrawals made by you may require modifications and adjustments to be made in your account to correct your asset allocation.

Fee Exclusions

Our fees do not include any charges imposed by third parties, such as custodian fees or mutual fund expenses. You may incur brokerage charges and other transaction costs, unless your brokerage firm. See "Brokerage Practices" below for our discussion of brokerage firms.

Termination Provisions for Portfolio Management

You have five (5) business days after entering into an Investment Advisory Agreement to cancel our portfolio management services and not incur any fees charged by us. Thereafter, should you want to terminate investment services on a day other than the last day of a calendar quarter, the Company, at its discretion, may retain the unused portion of the quarterly management fee based on time, research and other expenses involved in the account set-up and implementation.

To terminate our portfolio management services, send a written notice to us at least 10 days before to the actual termination date. Include in the notice clear instructions on what you want done with your account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity). Once we have received your termination notice and we have implemented your instructions, we are no longer responsible for the management of your assets. From the date that the termination goes into effect, you become responsible to make your own investment decisions.

PERFORMANCE-BASED AND SIDE-BY-SIDE MANAGEMENT

We do not charge or accept performance-based fees – that is, fees based on a share of capital gains or appreciation of the assets of a client.

TYPES OF CLIENTS

We provide financial planning and portfolio management services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and/or small businesses that desire a high degree of personalized and professional service. We require that you have at least \$500,000 in assets to engage our portfolio management services, although we may make exceptions or reduce this minimum at our discretion.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

Our investment methodology is based on five (5) premises, each of which is devised from modern portfolio theory.

1. Clients are inherently risk-averse.
2. The markets are basically efficient.
3. The focus of attention is shifted away from individual securities analysis to consideration of portfolios as a whole, predicated on explicit risk-reward parameters.
4. For any level of risk that the client is willing to accept, there is a rate of return that should be achieved.
5. A diversified portfolio relies on investments across multiple asset classes to obtain a higher risk-adjusted rate of return.

Managed accounts are disciplined and focused to resist the temptation to react to short-term market fluctuations. We use a fundamental approach that incorporates economic conditions, earnings, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, and general level of interest rates, company management, debt ratios and tax benefits to make our allocation decisions.

We use analysis and research software developed by Morningstar® that provides insightful analysis, coordinated data, and tools for building and analyzing portfolios of stocks, mutual funds, ETFs, variable annuities, and closed-end funds. Other sources include general media of domestic, international and governmental newspapers, bulletins, magazines, books and other publications. Material prepared by the investment companies and research releases prepared by others are also used.

Investment Strategies

Generally, we recommend long-term investment strategies requiring a minimum of a three to five year time horizon and holding period.

Risk of Loss

An investment in securities involves risk of loss that you should be prepared to bear, including the possibility that you may lose some or the entire principal amount invested. There is always a risk that investments may not perform successfully.

All securities have some risks in common. General risks can be categorized as market risk, company risk, and business risk. Risks can be further categorized, such as interest rate risk or sector risk. Specific types of securities may have more or less of each type of risk. For example, usually fixed income securities are effected by interest rate risk, credit risk, call (timing) risk, event risk, inflation risk, legal risk, sector risk, etc. as well as risk from external factors. An ETF investing in securities of an underlying index of fixed income securities will have similar risks as

well as other risks, such as investment management strategy risk. Each asset class has its own risks associated with it and each portfolio has different risk and return characteristics.

We attempt to mitigate these risks through diversification across multiple asset classes, managing accounts with discipline and focus to resist the temptation to react to short-term market fluctuations.

DISCIPLINARY INFORMATION

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Company or the integrity of our management. We have no information that applies to this item.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We are required to disclose material relationships that we may have with related financial industry participants. In addition, we are required to disclose any conflicts of interest that these material relationships may create and provide you with information on how we address conflicts. We have no information that applies to this item.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

The Company has adopted a formal Code of Ethics. This Code of Ethics includes requirements to make sure that we meet our fiduciary responsibilities:

1. Clients are inherently risk-averse.
2. We will put your interests before our interests.
3. You have the right to specify your investment objectives, guidelines, and/or conditions on the overall management of your account.
4. We will not make investment decisions for our personal portfolios if the decision is based on information that is not also available to the investing public.
5. We will not participate in private placements or initial public offerings (IPO's) that may effect your investments without disclosure to you.

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6. We always make every effort to comply with all applicable federal and state regulations governing registered investment advisers.

The full text of our Code of Ethics is available to you on request.

On occasion, we may buy or sell securities that we recommend to clients. This practice would create a conflict of interest if the transactions were structured to trade on the market impact caused by recommendations made to our clients. Our clients' transactions and our own transactions usually trade in sufficiently broad markets where these transactions will not have an appreciable impact on the securities' market value. Our Chief Compliance Officer reviews our personal transactions quarterly to make sure that our personal transactions are consistent with advice given to clients.

BROKERAGE PRACTICES

Custodial and Brokerage

The choice of the brokerage firm to act as your account's custodian is always approved by you. However, the Company will suggest Shareholders Service Group, Inc., who uses the custody and clearing services of Pershing, LLC, a Bank of New York Securities Group Company. We suggest Shareholder Service Group because Shareholder Service Group specializes in meeting the unique servicing requirements of fee-only, independent registered investment advisers and their clients.

There has been no attempt to use custodian/brokerage firms based solely on the lowest commission rates available. Trading capabilities, investment inventory, client investment needs, financial strength, general reputation, and personal knowledge of each custodian firm are considered as well as other items, in making the suggestion to use Shareholder Service Group over another.

We have arrangements with Shareholders Service Group to waive all charges for access based on total client assets under management.

Shareholders Service Group provides custodial and brokerage services including on-line services for account administrative and operational support. On-line services include electronic trading, account forms and applications, trading authorization, accounting and reporting, and other relevant administration and support services.

Shareholders Service Group provides the Company with access to its institutional trading and operations services, which are typically not available to retail investors. These institutional services may include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors. Many of these services may be used to service all or a substantial number of the Company's accounts.

Shareholders Service Group is located at 9845 Erma Road, Suite 312, San Diego, CA 92131. Pershing, LLC is located at One Pershing Plaza, Jersey City, NJ 07399.

If you choose to direct us to use some other custodian/brokerage firm, it may cost you more money. We may be unable to achieve the most favorable execution of your transactions

because we may not be able to aggregate orders to reduce transaction costs or you may receive less favorable prices.

Aggregated Orders

When the Company buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders with Shareholders Service Group to be executed together as a single “block” in order to facilitate orderly and efficient execution. Where orders are aggregated, each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind as a result of the aggregation of client trades.

REVIEW OF ACCOUNTS

Each account is reviewed by Carl von dem Bussche on an ongoing basis to ensure that your needs and objectives are being met. All accounts are reviewed in the context of your investment objectives and guidelines. Any adjustments made to your predefined guidelines are dictated by your Investment Policy Statement. Cash needs will be adjusted as necessary.

We strongly recommend that your financial plans be reviewed at least annually. Material changes in your personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made.

We provide quarterly performance reports in addition to monthly or quarterly account statements provided by Shareholders Service Group or other custodians/brokerage firms.

CLIENT REFERRALS AND OTHER COMPENSATION

Additional Compensation

We often suggest the need for you to consult with an attorney, CPA, insurance agent, and/or securities representative so that certain aspects of your financial plan can be implemented. The Company is a fee-only investment advisor who does not earn commissions for the sale or implementation of any financial products. We do not share in any fees you pay to these professionals.

Some of the professionals that we recommend will refer their clients to us. As a result, this creates an incentive on our part to refer clients to only those professionals that send us referrals, rather than to someone who may provide better services at lower cost. To address this conflict, we want you to understand:

- ❖ The Company does not accept any economic benefit from referring clients to another professional without first notifying you of such possibilities. We act completely in a fiduciary capacity – putting your interests first.

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- ❖ The Company is a fee-only investment advisor – no officer, director, or employee will receive commissions associated with the recommendations made from a financial plan.
 - ❖ You are under no obligation to use any professional we recommend to prepare planning documents (*i.e.*, estate, insurance, tax, etc.). You are free to choose anyone to implement the recommendations made in your financial plan.
 - ❖ Certain professionals (insurance agents and brokerage firm representatives) may receive the commissions from purchases that you may make through their employer.

Referral Compensation

We have formal referral arrangements with Robert E. Crown, William E. Crown, III., Kenneth Delabre and G&O Financial Services. The Company pays them for client referrals (a percentage of our advisory fee). They are required to provide to you with full disclosure of the compensation paid to them. They are not permitted to offer investment advice on behalf of the Company. Clients obtained through a referral may pay higher fees on average than clients not obtained through referrals.

CUSTODY

All investments will be held in your name and you have the right to withdraw any individual investment in kind as well as to vote any investment shares held in your account. We do not intend to have custody of any of your funds or securities. This is a reason you will use an independently qualified custodian or brokerage firm to maintain your funds and securities.

You will not authorize us to withdraw or transfer any money, securities or property held in your account, except for the withdrawal of our advisory fees. We do not accept funds and securities on your behalf, nor do we issue instructions to your custodian for withdrawals of funds or securities without a written instruction from you for each withdrawal.

Periodically, you will receive account statements from your brokerage firm or custodian. You will also receive reports from us. We urge you to compare account statements you receive from your brokerage firm or custodian with these reports. Please let us know if there are any discrepancies.

INVESTMENT DISCRETION

When you engage our portfolio management services, you will sign a limited power of attorney giving Carl von dem Bussche and the Company discretion over the selection and amount of securities to be bought or sold and the timing of transactions so that we will not ask for your consent or approval of each transaction. This investment authority may be subject to specified investment objectives and guidelines and/or conditions imposed by you, as described above in "Advisory Business".

VOTING CLIENT SECURITIES

We do not accept authority to vote securities on your behalf. Your brokerage firm or custodian sends proxies or other solicitations about your securities directly to you. If you have questions about a particular solicitation, you can ask us for advice. You are not obligated to follow our advice on voting your securities.

FINANCIAL INFORMATION

The Company is required to provide you with certain financial information or disclosure about its financial condition. The Company has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients nor has it been the subject of a bankruptcy proceeding.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

This item does not apply to the Company.

BROCHURE SUPPLEMENT

Carl von dem Bussche, CFP®
Financial Guidance Group, Inc.
788 Samantha Drive
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(727) 787-7526
January 1, 2011

This brochure provides information about Carl von dem Bussche, CFP® that supplements Financial Guidance Group's brochure. You should have received a copy of that brochure. Please contact Carl von dem Bussche, CFP® if you did not receive Financial Guidance Group's brochure or if you have any questions about the contents of this supplement.

Additional information about Carl von dem Bussche, CFP® also is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Carl F. von dem Bussche, CFP® (1952)

Formal Education:

- St. Petersburg College, A.A. Business
- College for Financial Planning, Certified Financial Planner™ (CFP®)
- NAPFA – Registered Financial Advisor™
- Accredited Investment Fiduciary®
- FINRA Examinations: Series 7, 24 and 63 (Examinations no longer active)

Business Background:

Financial Guidance Group, Inc.

- President and Chief Compliance Officer, 08/1993 to present

The CFP® certification, a professional certification granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"), is recognized in the United States and a number of other countries for its (1) standard of professional education; (2) code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. In order to receive this designation, Mr. von dem Bussche was required to complete the CFP Board's studies, pass a comprehensive CFP® Certified Examination, complete at least three years of full-time financial planning-related experience, and agree to abide by CFP Board's *Standards of Professional Conduct*. In order to maintain this designation, Mr. von dem Bussche completes 30 hours of continuing education every two years and renews his agreement to abide by the *Standards of Professional Conduct*.⁶

Mr. von dem Bussche is a NAPFA Registered Financial Advisor™, the top level of membership granted by The National Association of Personal Financial Advisors ("NAPFA"). To use this designation, NAPFA requires its members to agree to a strict definition of "Fee-only Financial Planner," agree to its Fiduciary Standard, provide advice across several specific disciplines, maintain CFP® credentials, undergo peer review, and complete 30 hours of continuing education annually,⁷ which is double the amount required to retain a CFP® designation.

The Accredited Investment Fiduciary® (AIF) is administered by the Center for Fiduciary Studies, LLC. The designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits.

Disciplinary Information

No information is applicable to this item for Mr. von dem Bussche.

⁶ Source: Certified Financial Planning Board of Standards' website.

⁷ Source: The National Association of Personal Financial Advisors' website.

Other Business Activities

No information is applicable to this item for Mr. von dem Bussche.

Additional Compensation

Mr. von dem Bussche does not receive any additional compensation from non-clients for providing advisory services.

Supervision

We have no supervisors senior to Mr. von dem Bussche. Mr. von dem Bussche is responsible for his own supervision. He adheres to high standards of ethical behavior and our Code of Ethics.

Requirements for State-Registered Advisers

This item does not apply to Mr. von dem Bussche.

BROCHURE SUPPLEMENT

Christoph von dem Bussche, CFP®

Financial Guidance Group, Inc.

788 Samantha Drive

Palm Harbor, FL 34683-6200

(727) 787-7526

January 1, 2011

This brochure provides information about Christoph von dem Bussche, CFP® that supplements Financial Guidance Group's brochure. You should have received a copy of that brochure. Please contact Carl von dem Bussche, CFP® if you did not receive Financial Guidance Group's brochure or if you have any questions about the contents of this supplement.

Additional information about Christoph von dem Bussche, CFP® also is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Christoph von dem Bussche, CFP® (1981)

Formal Education:

- Clearwater Christian College, B.S. Business Administration
- College for Financial Planning, Certified Financial Planner™ (CFP®)

Business Background:

Financial Guidance Group, Inc.

- Investment Adviser Representative, 04/2005 to present

INVEST Financial Corporation

- Pershing Team Leader and Customer Support Representative, 03/2003 - 03/2005

The CFP® certification, a professional certification granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"), is recognized in the United States and a number of other countries for its (1) standard of professional education; (2) code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. In order to receive this designation, Mr. von dem Bussche was required to complete the CFP Board's studies, pass a comprehensive CFP® Certified Examination, complete at least three years of full-time financial planning-related experience, and agree to abide by CFP Board's *Standards of Professional Conduct*. In order to maintain this designation, Mr. von dem Bussche completes 30 hours of continuing education every two years and renews his agreement to abide by the *Standards of Professional Conduct*.⁸

Disciplinary Information

No information is applicable to this item for Mr. von dem Bussche.

Other Business Activities

No information is applicable to this item for Mr. von dem Bussche.

Additional Compensation

Mr. von dem Bussche does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. von dem Bussche's supervisor is Carl von dem Bussche, President and Chief Compliance Officer, telephone number: (727) 787-7526. Mr. Carl von dem Bussche reviews accounts handled by Mr. Christoph von dem Bussche to make sure that accounts' activities are

⁸ Source: Certified Financial Planning Board of Standards' website.

appropriate for the clients' investment objectives and individual situations. Mr. Carl von dem Bussche also reviews Mr. Christoph von dem Bussche's personal securities transactions to make sure that Mr. Christoph von dem Bussche is adhering to Financial Guidance Group's Code of Ethics.

Requirements for State-Registered Advisers

This item does not apply to Mr. von dem Bussche.