



# Golden Years Financial, LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Golden Years Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (702) 258-4455 or by email at: [mark@gyfinancial.com](mailto:mark@gyfinancial.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 authority.*

*Additional information about Golden Years Financial, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Golden Years Financial, LLC's CRD number is: 286458.*

7201 W Lake Mead Blvd, Suite 120  
Las Vegas, NV 89128  
(702) 258-4455  
[mark@gyfinancial.com](mailto:mark@gyfinancial.com)  
<https://www.gyfinancial.com>

*Registration does not imply a certain level of skill or training.*

Version Date: 02/10/2026

## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Golden Years Financial, LLC on 03/10/2025 are described below. Material changes relate to Golden Years Financial, LLC's policies, practices or conflicts of interests only.

- None

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes .....	ii
Item 3: Table of Contents .....	iii
Item 4: Advisory Business .....	2
A. Description of the Advisory Firm.....	2
B. Types of Advisory Services .....	2
C. Client Tailored Services and Client Imposed Restrictions .....	3
D. Wrap Fee Programs .....	3
E. Assets Under Management .....	3
Item 5: Fees and Compensation .....	3
A. Fee Schedule .....	3
B. Payment of Fees .....	4
C. Client Responsibility For Third Party Fees.....	5
D. Prepayment of Fees.....	5
E. Outside Compensation For the Sale of Securities to Clients.....	5
Item 6: Performance-Based Fees and Side-By-Side Management .....	6
Item 7: Types of Clients.....	6
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	6
A. Methods of Analysis and Investment Strategies .....	6
B. Material Risks Involved.....	6
C. Risks of Specific Securities Utilized .....	7
Item 9: Disciplinary Information.....	9
A. Criminal or Civil Actions .....	9
B. Administrative Proceedings.....	9
C. Self-regulatory Organization (SRO) Proceedings .....	9
Item 10: Other Financial Industry Activities and Affiliations.....	9
A. Registration as a Broker/Dealer or Broker/Dealer Representative.....	9
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	9

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests .....	9
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	10
A. Code of Ethics .....	10
B. Recommendations Involving Material Financial Interests .....	10
C. Investing Personal Money in the Same Securities as Clients.....	10
D. Trading Securities At/ Around the Same Time as Clients' Securities .....	11
Item 12: Brokerage Practices.....	11
A. Factors Used to Select Custodians and/or Broker/Dealers .....	11
1. Research and Other Soft-Dollar Benefits .....	11
2. Brokerage for Client Referrals.....	11
3. Clients Directing Which Broker/Dealer/Custodian to Use .....	11
B. Aggregating (Block) Trading for Multiple Client Accounts.....	11
Item 13: Review of Accounts .....	12
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews .....	12
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts .....	12
C. Content and Frequency of Regular Reports Provided to Clients.....	12
Item 14: Client Referrals and Other Compensation .....	12
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) .....	12
B. Compensation to Non - Advisory Personnel for Client Referrals.....	14
Item 15: Custody .....	14
Item 16: Investment Discretion .....	14
Item 17: Voting Client Securities (Proxy Voting).....	15
Item 18: Financial Information .....	15
A. Balance Sheet.....	15
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	15
C. Bankruptcy Petitions in Previous Ten Years.....	15
Item 19: Requirements For State Registered Advisers.....	15
A. Principal Executive Officers and Management Persons; Their Formal Education and Business	

Background..... 15

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any) ..... 15

C. Calculation of Performance-Based Fees and Degree of Risk to Clients ..... 16

D. Material Disciplinary Disclosures for Management Persons of this Firm..... 16

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)..... 16

## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Golden Years Financial, LLC (hereinafter “GYF”) is a Limited Liability Company organized in the State of Nevada. The firm was formed in February 2017, and the principal owner is Mark Robert Cordner.

### **B. Types of Advisory Services**

#### ***Portfolio Management & Selection of Other Advisers***

GYF will direct clients to third-party investment advisers. Before selecting other advisers for clients, GYF will always ensure those other advisers are properly licensed or registered as an investment adviser. GYF conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. GYF then makes investments with a third-party investment adviser by referring the client to the third-party adviser. GYF will review the ongoing performance of the third-party adviser.

#### ***Portfolio Analysis Services***

GYF performs a portfolio Risk Analysis service; looking deeply into the holdings of a client’s portfolio. Specifically, GYF will review the client’s current financial situation, including annual income, savings, tax levels, and risk tolerance levels. GYF will then prepare a report for the client and work with the client to ensure that investments match the client’s risk tolerance, goals, and time horizon.

#### ***Financial Planning***

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; debt/credit planning and long term care planning.

#### ***Services Limited to Specific Types of Investments***

GYF generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), structured notes, insurance products including annuities and equities, although GYF primarily recommends structured funds. GYF may use other securities as well to help diversify a portfolio when applicable.

**C. Client Tailored Services and Client Imposed Restrictions**

GYF offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

**D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. GYF does not participate in any wrap fee programs.

**E. Assets Under Management**

GYF has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$40,010,000	\$ 0	January 7, 2026

**Item 5: Fees and Compensation**

**A. Fee Schedule**

*Portfolio Management & Selection of Other Advisers Fees*

GYF will direct clients to a variety of investment managers and will, in conjunction with the client, identify the investment manager that best suits the client’s needs and financial circumstances. GYF’s annual fee schedule is as follows, this fee schedule does not include any advisory fees charged by the investment manager:

**Co-Adviser Compensation: Fees** (as % of assets under management)

Market Value	GYF’s Fee
First \$500,000	0.99%
Nest \$500,000	0.99%
Next \$1,000,000	0.75%
Next \$2,000,000	0.75%
Next \$6,000,000	0.50%
Over \$10,000,000	0.50%

The value of the account as of the last business day of the month or quarter, depending on the investment manager, is used for purposes of calculating the advisory fee. These fees are negotiable and are separate from the expense ratio associated with the respective investment manager's funds. The investment managers do not receive advisory fees but are compensated solely from fees associated with the investment funds chosen. As discussed above, the aggregate management fees charged by GYF and the selected investment managers will not exceed 3.00% annually.

These fees are negotiable, any discount or reduction to the total Management Fee will reduce GYF's portion of the Management Fee.

Investment managers will collect an advisory fee in advance of every month or quarter directly from the clients' account. They also collect GYF's co-advisor fee and sends it to GYF directly.

### ***Portfolio Risk Analysis Fees***

The Portfolio Risk Analysis service will be offered to all clients, including those using GYF's other advisory services. Clients will pay a one-time (non-recurring) fixed fee of \$500 for the MRI service. This fee is negotiable and is charged to all prospective clients unless reduced or waived in GYF's sole discretion.

### ***Financial Planning Fees***

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$200 and \$2,000.

#### **Hourly Fees**

The negotiated hourly fee for these services is between \$200 and \$400.

Clients may terminate the agreement without penalty, for full refund of GYF's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management & Selection of Other Advisers Fees***

Fees are withdrawn directly from the client's accounts with client's written authorization. The Investment Manager calculates and withdraws the fee based on the negotiated rate memorialized in the client contract; The Investment Manager does not bill clients directly. GYF does not directly deduct the advisory fees. Fees are paid monthly or quarterly in advance, per the Investment Manager selection.

### ***Payment of Portfolio Analysis Fees***

The Portfolio Analysis fee is paid in advance via check.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check.

Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Hourly financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by GYF. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

GYF collects fees in advance. Refunds for fees paid in advance will be returned to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither GYF nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## Item 6: Performance-Based Fees and Side-By-Side Management

GYF does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

GYF generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of GYF's services.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

GYF's methods of analysis include Modern portfolio theory.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

#### *Investment Strategies*

GYF uses long term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

#### *Methods of Analysis*

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will

evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** GYF's selection process cannot ensure that money managers will perform as desired and GYF will have no control over the day-to-day operations of any of its selected money managers. GYF would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment “style drift” or even regulatory breaches or fraud.

**Artificial Intelligence and Machine Learning Risk.** Certain service providers utilized by the Firm to service client accounts have artificial intelligence components. The use of artificial intelligence and machine learning includes increased risk of data inaccuracies and security vulnerabilities. Due to the rapid advancement of machine learning technologies, future risks related to artificial intelligence are unpredictable. As a measure to mitigate these risks to our clients, the Firm performs periodic due diligence of our service providers for assurance that the service providers have appropriate controls in place to protect our clients' information and to limit data inaccuracies when artificial intelligence is used by the service provider.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each

company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Real estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Structured notes** are debt securities issued by financial institutions with performance linked to an underlying index or indices. Specifically, the return is typically based on a single equity, a basket of equities, equity indices, interest rates, commodities, or foreign currencies. The performance of a structured note is linked to the performance of the underlying investment, so risk factors applicable to that investment will also apply to the structure note. Investing in structured notes also carries liquidity risk, credit risk, and market risk. There is also the risk of capital loss and additional complexity beyond more direct investment in the underlying asset.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither GYF nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither GYF nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Mark Robert Cordner is President and a licensed insurance agent with Cordner Financial Services, Inc. (dba Golden Years Insurance Services), and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. GYF always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of GYF in connection with such individual's activities outside of GYF.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

GYF may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay GYF its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between GYF and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. GYF will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. GYF will ensure that all recommended advisers are licensed or notice filed in the states in which GYF is recommending them to clients.

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

#### **A. Code of Ethics**

GYF has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. GYF's Code of Ethics is available free upon request to any client or prospective client.

#### **B. Recommendations Involving Material Financial Interests**

GYF does not recommend that clients buy or sell any security in which a related person to GYF or GYF has a material financial interest.

#### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of GYF may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GYF to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. GYF will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of GYF may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of GYF to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, GYF will never engage in trading that operates to the client's disadvantage if representatives of GYF buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on GYF's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

GYF recommends clients choose among a variety of custodians and will, in conjunction with the client, identify the custodian best suited for their needs, among the following: Schwab Institutional, a division of Charles Schwab & Co., Inc., and TCA by E\*Trade Trust Company of America.

#### **1. *Research and Other Soft-Dollar Benefits***

GYF does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

#### **2. *Brokerage for Client Referrals***

GYF receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

GYF does not trade client's accounts.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

GYF does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

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

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for GYF's advisory services provided on an ongoing basis are reviewed at least annually by Mark R Cordner, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at GYF are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Mark R Cordner, President. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, GYF's services will generally conclude upon delivery of the financial plan, unless subsequent plans are requested or volunteered.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of GYF's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

GYF compensation from third-party advisers to which it directs clients.

With respect to Schwab, GYF receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no

charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For GYF client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to GYF other products and services that benefit GYF but may not benefit its clients' accounts. These benefits may include national, regional or GYF specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of GYF by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist GYF in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of GYF's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of GYF's accounts. Schwab Advisor Services also makes available to GYF other services intended to help GYF manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to GYF by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to GYF. GYF is independently owned and operated and not affiliated with Schwab.

#### **B. Compensation to Non – Advisory Personnel for Client Referrals**

GYF does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian by Investment

Managers. GYF does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements.

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

Before GYF can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the "Advisory Business" section of this Brochure for more information on our discretionary management services.

### **Item 17: Voting Client Securities (Proxy Voting)**

GYF will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

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

#### **A. Balance Sheet**

GYF neither requires nor solicits prepayment of more than \$1,000 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

#### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither GYF nor its management has any financial condition that is likely to reasonably impair GYF's ability to meet contractual commitments to clients.

#### **C. Bankruptcy Petitions in Previous Ten Years**

Neither GYF nor its management has been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

The education and business backgrounds of GYF's current management persons, Mark R Cordner and Mark Robert Cordner, can be found on the Form ADV Part 2B brochure supplements for those individuals.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### **C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

GYF does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.