Item 1 – Cover Page

Laguna Wealth Advisors, LLC
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Aliso Viejo, CA 92656

949 464-4466

www.LagunaWealth.com

1/1/2014

This Brochure provides information about the qualifications and business practices of Laguna Wealth Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at 949-464-4466/info@LagunaWealth.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.

LAGUNA WEALTH ADVISORS, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about LAGUNA WEALTH ADVISORS, LLC also is available on our website at www.LagunaWealth.com or on the SEC's website at www.adviserinfo.sec.gov. You can search this site for us using our unique CRD Number, 167847.

Item 2 – 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 1/1/2014 is an update to the previous document, dated 6/1/2013, and is prepared according to the SEC's new requirements and rules.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Additional information about Laguna Wealth Advisors, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Laguna Wealth Advisors, LLC who are registered, or are required to be registered, as investment adviser representatives of Laguna Wealth Advisors, LLC.

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Item 4 – Advisory Business

Laguna Wealth Advisors, LLC is a California state-registered investment adviser with its principal place of business located in California. Laguna Wealth Advisors, LLC began conducting business in 2013. It is a single member LLC and John Robert LaBriola is the managing member.

Laguna Wealth Advisors, LLC was founded with the purpose of providing assistance in the planning of a Client's overall financial affairs. The Firm practices comprehensive Financial Planning and Investment Portfolio Management.

FINANCIAL PLANNING

The Firm serves as financial planning adviser for individuals, corporations, entrepreneurs, trusts and small businesses. Laguna Wealth Advisors, LLC's goal is to work with the Client and his or her other advisers, providing financial planning consultation and over-all coordination on a personal basis.

Most people can profit from assistance in managing their financial affairs. Not all people, though, need to have a written comprehensive financial plan. Everyone, however, can benefit from the financial planning process, a procedure designed to find alternative solutions to specific financial problems as well as to allow the more efficient management of one's financial affairs.

Proper financial planning identifies specific goals and objectives. The process requires a complete review of a Client's assets, retirement benefit programs, insurance contracts, potential income and estate taxes, wills and trust agreements, and other related matters.

Financial planning advisory services involve reviewing the Client's financial affairs, creating a written financial plan, aiding the Client in implementing agreed-upon recommendations and providing ongoing monitoring of goals and objectives.

All information and recommendations furnished by Laguna Wealth Advisors, LLC to the Client and all information furnished by the Client to Laguna Wealth Advisors, LLC shall at all times be held in confidence and shall not be disclosed to third persons except as required by law or by the prior written consent of the Client.

A conflict of interest may exist between the interests of the investment adviser and the interests of the client, and the client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

In addition to traditional financial planning services, Laguna Wealth Advisors, LLC offers divorce settlement analysis services to individuals contemplating, or in the process of, divorce.

INDIVIDUAL PORTFOLIO MANAGEMENT

Laguna Wealth Advisors, LLC provides asset management of client funds based on the individual needs of the client. As a result of discussions with the client about their goals, needs, and objectives, we work with the client to define their investment objectives. We then create and manage a portfolio of securities based on those objectives. During the data gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We will also review and discuss a client's prior investment history, as well as family composition and background.

Laguna Wealth Advisors, LLC manages these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., capital preservation, income, growth and income, growth, or aggressive growth), as well as tax considerations. These factors are used to create an appropriate target asset allocation for each client.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Once the client's portfolio has been established, it is reviewed periodically, and, when necessary, rebalance the portfolio based on the client's individual needs and market outlook.

Laguna Wealth Advisors, LLC's investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Corporate debt securities
- Certificates of deposit
- United States governmental securities
- Municipal securities
- Mutual fund shares
- Options contracts on securities
- Alternative Investments, including but not limited to: managed futures funds, hedge funds, and private equity funds.
- Third Party Money Managers; also known as Separately Managed Accounts (SMA)

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial

circumstances, we will maintain client suitability information in each client's file and, at least annually, contact each participating client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose investment restrictions or modify existing restrictions.

AMOUNT OF MANAGED ASSETS

As of 12/31/2013, $32,754,045 of clients' assets were actively managed on a discretionary basis plus $16,248,553 of clients' assets on a non-discretionary basis.

Laguna Wealth Advisors, LLC does not offer a wrap fee program.

Item 5 – Fees and Compensation

FEE SCHEDULE

Stand-Alone Financial Planning (without Investment Advice) and Divorce Financial Analysis:

$250.00 per planner-hour, billed bi-weekly in arrears.

This is not a significant part our business.

Financial Planning and Investment Advice will be charged an annual fee for "assets under management" (AUM) which will cover all services associated with the clients financial planning and asset management according to the following schedule:

First $500,000 at 1.5%
Next $500,000 at 1.25%
Next $2,000,000 at 0.90%
Amounts greater than $3,000,000 at 0.65%

Although Laguna Wealth Advisors, LLC has established the above mentioned fee schedule, we retain the right to negotiate alternative fees on a client-by-client basis. Discounts, not generally available to clients, may be offered to family members and friends of associated persons on Laguna Wealth Advisors, LLC. The specific manner in which fees are charged by Laguna Wealth Advisors, LLC is established in a client's written agreement with Laguna Wealth Advisors, LLC. (NOTE: Lower fees for comparable services may be available from other sources.)

Laguna Wealth Advisors, LLC will generally bill its fees on a quarterly basis. These fees will be billed in arrears based upon the previous quarters ending account balance (market value or fair market value in the absence of market value) adjusted for in/out flows. Clients authorize

Laguna Wealth Advisors, LLC to directly debit fees from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon the number of days of management and the number of days in the quarter. Upon termination of any account any earned, unpaid fees will be due and payable.

Laguna Wealth Advisors, LLC's fees are exclusive of transaction fees and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment managers (Separately Managed Accounts) and other third parties such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Laguna Wealth Advisors, LLC's fee, and Laguna Wealth Advisors, LLC shall not receive any portion of these commissions, fees, and costs.

Mutual Funds are offered in various share classes with each having differing up-front and internal expenses. At the time of purchase care is given to select the most cost effective share class based upon the size of the trade and estimated holding period for each purchase.

Clients have the option to purchase investment products that Laguna Wealth Advisors, LLC recommends through other brokers or agents that are not affiliated with Laguna Wealth Advisors, LLC.

Item 6 – Performance-Based Fees and Side-By-Side Management

Laguna Wealth Advisors, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Laguna Wealth Advisors, LLC provides portfolio management services to high net worth individuals, high income professionals, qualified retirement plans, business entities (such as corporations, LLC's, LLP's), trusts and estates, and individuals anticipating or in retirement.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

METHODS OF ANALYSIS

We may use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting - In this type of technical analysis, charts of market and security activity are reviewed in an attempt to identify when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

Fundamental Analysis - The intrinsic value of a security is attempted to be measured by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis - Past market movements are analyzed and that analysis is applied to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis - In this type of technical analysis, the movements of a particular stock against the overall market is measured in an attempt to predict the price movement of the security.

Quantitative Analysis - Mathematical models are used in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis - Non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement are subjectively evaluated, and used to predict changes to share price based on that data.

A risk is using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation - Rather than focusing primarily on securities selection, an appropriate ratio of securities - equities, fixed income, alternative investments, and cash – is attempted to be identified suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis - The experience and track record of the manager of the mutual fund or ETF is reviewed in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. The underlying assets in a mutual fund or ETF is also reviewed in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. Funds or ETFs are monitored in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis - Laguna Wealth Advisors, LLC's securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While alert to indications that data may be incorrect, there is always a risk that the analysis may be compromised by inaccurate or misleading information.

"Investing in securities involves risk of loss that clients should be prepared to bear."

INVESTMENT STRATEGIES

Laguna Wealth Advisors, LLC uses the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases: Securities are purchased with the intention of holding them in the client's account for a year or longer. This strategy is typically employed when:

- the securities are believed to be currently undervalued, and/or
- exposure to a particular asset class over time, regardless of the current projection for this class, is desired.

A risk in a long-term purchase strategy is that by holding the security for this length of time, short-term gains that could be profitable to a client may be missed. Moreover, if the analysis is incorrect, a security may decline sharply in value before the decision to sell is made.

Short-term purchases: When utilizing this strategy, securities are purchased with the intention of selling them within a relatively short period of time (typically a year or less). This is done in an attempt to take advantage of near term conditions that will potentially result in a price swing in the securities purchased.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Laguna Wealth Advisors, LLC or the integrity of Laguna Wealth Advisors, LLC's management. Laguna Wealth Advisors, LLC has no information applicable to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

None

Item 11 – Code of Ethics

Laguna Wealth Advisors, LLC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Laguna Wealth Advisors, LLC must acknowledge the terms of the Code of Ethics annually, or as amended.

Laguna Wealth Advisors, LLC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Laguna Wealth Advisors, LLC has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Laguna Wealth Advisors, LLC, its affiliates and/or clients, directly or indirectly, have a position of interest. Laguna Wealth Advisors, LLC's employees and persons associated with Laguna Wealth Advisors, LLC are required to follow Laguna Wealth Advisors, LLC's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Laguna Wealth Advisors, LLC and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Laguna Wealth Advisors, LLC's clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Laguna Wealth Advisors, LLC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Laguna Wealth Advisors, LLC's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between Laguna Wealth Advisors, LLC and its clients.

It is Laguna Wealth Advisors, LLC's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Laguna Wealth Advisors, LLC will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Laguna Wealth Advisors, LLC or any related person does not have authority to determine, without obtaining specific client consent, the broker or dealer to be used, or the commission rates paid.

Laguna Wealth Advisors, LLC recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Laguna Wealth Advisors, LLC is independently owned and operated and not affiliated with Schwab.

Schwab Institutional provides Laguna Wealth Advisors, LLC with access to its 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 Institutional. These services are not contingent upon our firm committing to Schwab Institutional any specific amount of business (assets in custody or trading commissions). Schwab Institutional's brokerage services include the execution of securities transactions, custody, research, 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 our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab Institutional or that settle into Schwab Institutional accounts.

Schwab Institutional also makes available to our firm other products and services that benefit Laguna Wealth Advisors, LLC but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab Institutional's products and services that assist us in managing and administering our clients' accounts include software and other technology that

i. provide access to client account data (such as trade confirmations and account statements);

ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;

iii. provide research, pricing and other market data;

iv. facilitate payment of our fees from clients' accounts; and

v. assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

i. compliance, legal and business consulting;

ii. publications and conferences on practice management and business succession; and

iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Laguna Wealth Advisors, LLC. Schwab Institutional 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 our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we

may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Item 13 – Review of Accounts

Mr. John LaBriola, managing member of Laguna Wealth Advisors, LLC, reviews ledger transactions daily, portfolio allocations and strategy monthly, and performance analysis and portfolio changes quarterly. Additional factors may trigger an in-depth review. Some of these factors are listed below:

- A major change in client circumstances
- A large deposit to, or withdrawal from, the portfolio
- A dramatic move in the market
- A change in funds management or fund objectives

Laguna Wealth Advisors, LLC will mail and/or email Quarterly Performance Reports on a quarterly basis, updating clients on the status of their portfolios. Client will also receive monthly reports from their custodian showing the value of account holdings and other activities.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Item 14 – Client Referrals and Other Compensation

No compensation is provided for client referrals.

Item 15 – Custody

Laguna Wealth Advisors, LLC does not have actual or constructive custody of client assets.

Clients should receive at least monthly statements from the qualified custodian that holds and maintains client's investment assets. Laguna Wealth Advisors, LLC urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Laguna Wealth Advisors, LLC usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold, and to enter transactions directly for client portfolios. Typically, these transactions are entered without discussing them with the client. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Laguna Wealth Advisors, LLC observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Laguna Wealth Advisors, LLC's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Laguna Wealth Advisors, LLC does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Laguna Wealth Advisors, LLC may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Laguna Wealth Advisors, LLC has no financial condition that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. We do not require, nor solicit, payment of fees in excess of $500 per client more than six months in advance of services rendered. As such, we are not required to include a financial statement.

Item 19 – Requirements for State-Registered Advisers

EDUCATION AND BACKGROUND OF KEY PERSONNEL

John Robert LaBriola, born in 1956, is the founder and owner of Laguna Wealth Advisors, LLC in Aliso Viejo, California.

EDUCATION & DESIGNATIONS

Mr. LaBriola earned his MBA from the University of Southern California, Graduate School of Business in 1980 and his Bachelor of Science degree in Civil and Environmental Engineering from the University of California at Irvine in 1978.

Mr. LaBriola has been licensed to use the CFP® mark by the Certified Financial Planner Board of Standards Inc. since 2006.

Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards.

As a financial planning practitioner, Mr. LaBriola assists clients with general financial planning and asset management. This encompasses cash management, tax minimization, risk management, retirement and estate planning, and investment portfolio design and management.

Mr. LaBriola completed a specialized educational program in the financial and tax issues of divorce from the Institute for Divorce Financial Analysts™ (IDFA™) and is a Certified Divorce Financial Analyst™ (CDFA™).

As a CDFA™, Mr. LaBriola is trained to provide financial information and assistance to people going through a divorce. Working with clients individually or as couples, he evaluates the tax implications of dividing property, the financial impact of various settlement options for dividing marital property (including pensions) and child and spousal support payments, offering comprehensive reports showing what the client's financial future might look like if they accept a proposed divorce settlement.

Mr. LaBriola does not provide legal nor tax accounting advice.

BUSINESS EXPERIENCE

Prior to establishing Laguna Wealth Advisors, LLC, Mr. LaBriola had over 20 years of experience in the financial services industry, with advisory positions at both a Registered Investment Advisory firm and a national Broker-Dealer; Sagent Wealth Management from 1/2010 thru 8/2013; Purshe Kaplan Sterling Investments from 1/2010 thru 12/2012; and Merrill Lynch, Pierce, Fenner & Smith, Inc. from 11/1992 thru 1/2010.

INVESTMENT-RELATED ACTIVITIES

John Robert LaBriola is not engaged in any investment-related activities

John Robert LaBriola does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

OTHER BUSINESS ACTIVITIES

Mr. LaBriola is a 25% owner, Vice President, and Board of Directors Member for both the Fountain Valley Skating Center and RTL Properties, Inc. These two corporations, located in Fountain Valley, California, comprise the operation of a family-owned roller skating business, and do not cause a conflict of interest, nor subtract from Mr. LaBriola's commitment to his role at Laguna Wealth Advisors, LLC.

ADDITIONAL COMPENSATION

Other than fees described in Item 5 of this brochure, Mr. LaBriola receives no additional compensation for investment advice.

OTHER DISCLOSURES

Mr. LaBriola has not been the subject of an arbitration claim, nor has he been involved in any investment related proceeding. Mr. LaBriola has not been the subject of a bankruptcy petition. Mr. LaBriola has no reportable disciplinary history.

All material conflicts of interest under CCR Section 260.238 (k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

He has no other material facts to disclose.

SECURITIES ISSUER RELATIONSHIP

Mr. LaBriola has no relationship with any issuer of securities.

SUPERVISION

Mr. LaBriola supervises the activities of Laguna Wealth Advisors, LLC.