

Item 1 – Cover Page



Laguna Wealth Advisors, LLC
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03/17/2023

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 3/17/2023 is an update to the previous document, dated 03/04/2022, 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.

There are no material changes from the previous disclosure document, dated 3/04/2022.

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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.

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, private credit 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.

IRA ROLLOVER RECOMMENDATIONS

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

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

AMOUNT OF MANAGED ASSETS

As of 03/17/2023, \$93,047,062 of clients' assets were actively managed on a discretionary basis plus \$17,517,698 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):

\$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 different 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 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 in 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 other 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

Outside of Laguna Wealth Advisors, LLC Investment Advisor Representatives writes Non-Registered insurance and annuity business with PKS Financial Services Inc. and their affiliates and receives compensation. They also act as a 'referring agent' for Structured Settlements and may receive compensation for these referrals.

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

The custodian and brokers we use

Launa Wealth Advisors, LLC does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

How we select brokers/custodians

We seek to recommend Schwab, a custodian/broker that will hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services

- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

Your brokerage and custody costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. Schwab’s commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”). By using another broker or dealer you may pay lower transaction costs.

Products and services available to us from Schwab

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors

may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets.

The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you. Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us.

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

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs

- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself.

In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. In some cases, the services that Schwab pays for are provided by an affiliate of ours or by another party that has some pecuniary, financial or other interests in us (or in which we have such an interest). This creates an additional conflict of interest. We believe, however, that taken in the aggregate, our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

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

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Laguna Wealth Advisors, LLC may enter into arrangements with unaffiliated individuals or entities (“Solicitor”) that will refer clients to Laguna Wealth Advisors, LLC for investment advisory services. In return, Laguna Wealth Advisors, LLC will agree to pay the Solicitor a fee for the referral.

Solicitor’s associates are not employees of Laguna Wealth Advisors, LLC. Solicitor and Laguna Wealth Advisors, LLC are independent entities under separate ownership and control.

The Solicitor is not authorized to provide investment advice or manage investments on behalf of or through Laguna Wealth Advisors, LLC. The Solicitor does not have authority to accept an investment advisory agreement on behalf of Laguna Wealth Advisors, LLC or to collect or receive payment in its own name for any investment advisory services of Laguna Wealth Advisors, LLC. Solicitor’s role on behalf of Laguna Wealth Advisors, LLC is limited strictly to introducing or referring prospective clients to Laguna Wealth Advisors, LLC.

Compensation paid by Laguna Wealth Advisors, LLC to the Solicitor is dependent upon the client entering into an investment advisory agreement with Laguna Wealth Advisors, LLC. Compensation paid by Laguna Wealth Advisors, LLC to the Solicitor will be an agreed upon percentage of the investment advisory fee of Laguna Wealth Advisors, LLC as specified in the Solicitor's disclosure statement provided to the client.

The investment advisory fee charged to a client will not increase as a result of compensation being shared by Laguna Wealth Advisors, LLC with Solicitor.

This referral program of Laguna Wealth Advisors, LLC will be in compliance with the requirements of applicable federal or state regulations. The solicitation/referral fee is paid pursuant to a written agreement retained by both Laguna Wealth Advisors, LLC and Solicitor. Solicitor will be required to provide the client with a copy of disclosure documents, including Laguna Wealth Advisors, LLC's Form ADV Part 2A disclosure brochure, Part 2B brochure supplement(s), and Solicitor's disclosure document at the time of the referral.

Item 15 - Custody

In our effort to provide superior customer service, many clients of Laguna Wealth Advisors, LLC have provided Laguna Wealth Advisors, LLC written standing authority to transfer funds from one of their accounts to another account, based on verbal instructions without having to receive written instructions for each such transfer. Several examples include 'transferring IRA distributions to a joint or trust account', 'transferring funds from a business account to the personal account of the business owner or vice versa', and 'transferring funds from their Schwab brokerage account to an outside bank account or vice versa'. In all cases these standing instructions have been authorized by written instructions granting the Investment Adviser (IA) this power. Under no circumstances is the investment adviser a party to the receiving account, unless the investment advisor has interest in the sending account (i.e. where he was an authorized party of the sending account).

The current SEC interpretation of Third-Party Transfers is such that Laguna Wealth Advisors, LLC is deemed to have custody. However, Laguna Wealth Advisors, LLC is exempt from the requirements of providing audited financials and being subject to the SEC Surprise Exam because the following 7 conditions are met for any authorized Third-Party Transfer:

- 1 - Client provides signed instruction to custodian with third-party disbursement info
- 2 - Client authorizes IA in writing to direct transfers to third-party (e.g., on custodian form)
- 3 - Custodian verifies client instruction (e.g., signature verification and transfer of funds notice)
- 4 - Client may terminate or change the instruction with custodian

- 5 - IA cannot change instruction with custodian
- 6 - IA maintains records showing that third-party is not related to IA
- 7 - Custodian sends initial and annual notice & reminder to client

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 Dana Point, 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 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

Outside of Laguna Wealth Advisors, LLC Mr. LaBriola writes Non-Registered insurance and annuity business with PKS Financial Services Inc. and their affiliates and receives compensation. He also acts as a 'referring agent' for Structured Settlements and he receives compensation for these referrals.

Mr. LaBriola is a 25% owner, Treasurer, 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.

Item 1 - Cover Page

Part 2B of Form ADV: *Brochure Supplement*

John Robert LaBriola

Laguna Wealth Advisors, LLC

24551 Del Prado, #930
Dana Point, CA 92629

(949) 464-4466
John@LagunaWealth.com

03/17/2023

This brochure supplement provides information about John Robert LaBriola that supplements the Laguna Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact John LaBriola if you did not receive Laguna Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about John R. LaBriola is available on the SEC's website at www.adviserinfo.sec.gov. His CDR number is 2308699.

Item 2 - Educational, Background and Business Experience

John Robert LaBriola

Born: 1956

EDUCATION

University of California Irvine
Bachelors of Science, Civil & Environmental Engineering; 1978

University of Southern California
Masters of Business Administration, Business; 1980

College for Financial Planning
Certified Financial Planner Program; 2005

BUSINESS EXPERIENCE

Merrill Lynch, Pierce, Fenner & Smith, Inc.
Vice President; from 11/1992 to 01/2010

Purshe Kaplan Sterling Investments
Branch Manager, Registered Representative; from 01/2010 to 12/2012

Sagent Wealth Management
Partner, Sr. Financial Advisor, Wealth Management Specialist; from 1/2010 to 8/2013

Laguna Wealth Advisors, LLC
Principle & Founder, Wealth Management Advisor; from 8/2013 to present

Designations

John Robert LaBriola has earned the following designation(s) and is in good standing with the granting authority:

Certified Financial Planner Board of Standards
Certified Financial Planner® (CFP®); 2006

The program is administered by the Certified Financial Planner Board of Standards Inc. 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.

Item 3 - Disciplinary Information

John Robert LaBriola has no reportable disciplinary history.

Item 4 - Other Business Activities

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

Outside of Laguna Wealth Advisors, LLC Mr. LaBriola writes Non-Registered insurance and annuity business with PKS Financial Services Inc. and their affiliates, and receives compensation. He also acts as a 'referring agent' for Structured Settlements and he receives compensation for these referrals.

Mr. LaBriola is a 25% owner, Treasurer, 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.

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.

Item 5 - Additional Compensation

John R. LaBriola does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 – Supervision

Supervisor: John Robert LaBriola
Title: Owner/Managing Member
Phone Number: (949) 464-4466

John LaBriola is actively supervised by the supervisor named above.

Item 7 – Requirements for State-Registered Advisers

Mr. LaBriola has not been the subject of an arbitration claim, nor has he been involved in any investment related proceeding. He has no other material facts to disclose.

Mr. LaBriola has not been the subject of a bankruptcy petition.

Item 1 - Cover Page

Part 2B of Form ADV: *Brochure Supplement*

Isaiah Alexander Real

Laguna Wealth Advisors, LLC

300 Spectrum Center, Suite 400
Irvine, CA 92618

(949) 543-0640
Isaiah@LagunaWealth.com

03/17/2023

This brochure supplement provides information about Isaiah Alexander Real that supplements the Laguna Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Isaiah Real if you did not receive Laguna Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Isaiah A. Real is available on the SEC's website at www.adviserinfo.sec.gov. His CDR number is 5917996.

Item 2 - Educational, Background and Business Experience

Isaiah Alexander Real

Born: 1991

EDUCATION

California State University, Fullerton
Bachelor of Arts, Business Administration - Finance; 2014

BUSINESS EXPERIENCE

UBS Financial Services Inc.
Client Service Associate; from 01/2014 to 10/2014

UBS Financial Services Inc.
Registered Client Service Associate; from 10/2014 to 04/2015

UBS Financial Services Inc.
Wealth Strategy Associate; from 04/2015 to 07/2015

Miramontes Capital LLC
Wealth Advisor; from 07/2015 to 12/2017

Laguna Wealth Advisors, LLC
Financial Advisor; from 12/2017 to present

Designations

Isaiah Alexander Real has no current designations at this time.

Item 3 - Disciplinary Information

Isaiah Alexander Real has no reportable disciplinary history.

Item 4 - Other Business Activities

INVESTMENT-RELATED ACTIVITIES

Isaiah Alexander Real is not engaged in any investment-related activities.

Isaiah Alexander Real does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

OTHER BUSINESS ACTIVITIES

Isaiah Alexander Real is not engaged in any investment-related activities.

Isaiah Alexander Real does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

Item 5 - Additional Compensation

Isaiah Alexander Real does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 - Supervision

Supervisor: John Robert LaBriola
Title: Owner/Managing Member
Phone Number: (949) 464-4466

Isaiah Real is actively supervised by the supervisor named above.

Item 7 - Requirements for State-Registered Advisers

Mr. Real has not been the subject of an arbitration claim, nor has he been involved in any investment related proceeding. He has no other material facts to disclose.

Mr. Real has not been the subject of a bankruptcy petition.