

INTREPID



INTREPID FINANCIAL PLANNING GROUP, LLC.

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Brochure

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This brochure provides information about the qualifications and business practices of Intrepid Financial Planning Group, LLC. If you have any questions about the contents of this brochure, please contact us at (317) 818-1776 or intrepid@intrepidfinancial.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 Intrepid Financial Planning Group, LLC is also available on the United States Securities and Exchange Commission's website at www.adviserinfo.sec.gov.

Note regarding Material Changes from Previous Year

This is an amendment to the annual update of Intrepid Financial Planning Group, LLC's previous ADV Part 2 dated March 25, 2019, Amended May 10, 2019.

The May 10, 2019 amended ADV Part 2 was updated to reflect a change in principal ownership. Previously, Richard K. Locke was principal owner of Intrepid Financial. The principal ownership shifted to Joan Locke upon the passing of Mr. Locke.

Please contact Intrepid Financial Planning Group, LLC with any further questions regarding the information presented or the format in which it is presented.

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ADVISORY BUSINESS

About Intrepid

Often asked, Intrepid Financial Planning Group, LLC (IFPG) was not named after the car. Rather, our company was named after the aircraft carrier, USS Intrepid. Our founder and former lead portfolio manager, Richard K. Locke, was a crew member on the ship for four years while serving in the United States Navy. The ship was commissioned in 1943 and served our country until 1974. The USS Intrepid now serves as a historic museum in New York Harbor.



Mr. Locke was a former practicing CPA who started providing advisory and planning services to clients in 1988. IFPG was formed in 1998 and is a wholly owned subsidiary of Intrepid Financial, LLC of which Mr. Locke's wife, Joan Locke, is now the principal owner.

Currently, 18 tax and accounting professionals (primarily CPA's) are registered through IFPG as Investment Advisor Representatives (IAR). The IARs are owners of the tax and accounting practices which are independent of IFPG. The IARs supplement their tax and accounting practices with separate financial services entities which utilize IFPG for investment advisory services. The IARs perform basic marketing and service duties on behalf of their advisory clients. These duties include explaining IFPG services to prospective clients, completion of new account applications and risk tolerance questionnaires, periodic meetings with clients to review portfolios, and delivering quarterly statements prepared by IFPG. It is important to note the IARs are not actively involved in the construction of portfolios, asset allocation strategies, buying or selling securities, or selecting investments to include in portfolios. The

IARs receive portions of the advisory fees and net income earned by IFPG.

Advisory Business - Overview

IFPG is a fee-only based investment advisory firm registered with the United States Securities and Exchange Commission (SEC). IFPG is not a mutual fund or hedge fund. Client monies and accounts are not co-mingled with other client monies or accounts. IFPG customizes each client portfolio in an attempt to match the client's goals, risk tolerance, and expectations. IFPG utilizes both financial and non-financial information from clients in the customization process. Client portfolios are monitored and periodically adjusted.

Upon initiating IFPG services, IFPG executes an Investment Advisory Agreement (IAA) with clients. The IAA details IFPG services and fees. The agreement provides clients the right to terminate IFPG services at any time without any penalty charges.

IFPG utilizes TD Ameritrade as the primary custodian for client monies. TD Ameritrade is a broker-dealer and independent of IFPG, and provides each client with a monthly statement for each account maintained at TD Ameritrade. IFPG is listed on the statements as the client's independent advisor; however, IFPG does not participate in the preparation or delivery of these statements. IFPG also uses Charles Schwab and Company (also a broker-dealer) as a custodian for a few 401(k) plans for which IFPG provides advisory services.

IFPG investment advisory services are provided on a discretionary basis. Discretionary means clients give IFPG permission to buy and sell investments at IFPG's discretion without having to consult the client in advance of the transaction. The permission is granted to IFPG at the time the account is opened by signing a Limited Power of Attorney (LPOA). The LPOA is included in TD Ameritrade's account application. The LPOA also authorizes IFPG to deduct its' advisory fees directly from the account.

Although IFPG advisory services are provided on a discretionary basis, IFPG recognizes it is the client's money. Accordingly, clients are free to request IFPG to refrain from including certain types or categories of investments in their portfolio. Advisory clients are also free to request IFPG to include a specific investment in their portfolio or request IFPG to analyze and provide an opinion on an investment they are considering for inclusion.

IMPORTANT: ALL CLIENT CHECKS WRITTEN FOR OPENING AN ACCOUNT OR ADDING MONEY TO EXISTING ACCOUNTS MUST BE WRITTEN AS PAYABLE TO TD AMERITRADE OR CHARLES SCHWAB & CO. CHECKS CAN NOT BE WRITTEN TO IFPG, AN IAR, AN IFPG EMPLOYEE.

Advisory Business – Withdrawing Money From Accounts

IFPG clients frequently have needs to withdraw money from their accounts. Retirees often require a systematic amount, often monthly, to meet living expenses. These generally reflect a direct deposit into the client's personal checking account. IFPG manages these accounts in a manner to ensure funds are available for the monthly disbursement.

Clients may also need to make non-periodic withdrawals. In these instances, Federal regulations require the client to notify IFPG in writing (or via email) of the amount and from which account the funds are to be removed. If set up in advance, direct deposit can be used. Otherwise, the client will receive a check directly from TD Ameritrade, typically within a week of the request. Overnight mail can be requested.

It is important to note, although IFPG can make a request on behalf of clients to initiate a withdrawal, IFPG cannot access client funds at TD Ameritrade. TD Ameritrade will only forward funds to the client's address of record or checking account of record, both of which are established by the client.

Advisory Business – Customized Portfolios

Based upon discussions with individual clients and completion of a risk tolerance questionnaire, IFPG will construct and manage the client portfolio on a customized basis. The portfolios can range from

aggressive growth to income-driven. Broadly speaking, the portfolios are assigned percentages of exposure to stock market related investments and income driven investments. Examples would include aggressive growth (90% market, 10% income), balanced (50% market, 50% income), or income-driven (0-20% market, 80-100% income). The IFPG portfolio customization services reflect the availability of numerous market and income percentage allocations.

Advisory Business – Types of Investments

IFPG may include an array of different types of investments in client portfolios. These can include exchange traded funds, no-load mutual funds, individual stocks, individual bonds, structured products, and money market funds.

Advisory Business – Assets Under Management

As of December 31, 2019, IFPG managed \$271,234,357 on behalf of clients on a discretionary basis. None of the assets are managed on a non-discretionary basis. The assets managed include retirement roll-over accounts, IRA's, retirement plan assets, trust accounts, non-profit accounts, joint, and individual accounts.

Advisory Business – Client Portfolio Programs

IFPG does not require a specified minimum dollar amount clients must commit to its' advisory services. To accommodate smaller dollar amounts, IFPG has designed two programs referred to as Client Portfolio Advisory Services (CPAS). Program I is for clients with less than \$250,000 and those clients having more than \$250,000, but with a preference to have no individual common stock holdings in their portfolio. Program II is available to clients with \$250,000 or more and a preference to have individual common stocks included in their portfolio.

MANAGEMENT FEES & COMPENSATION

IFPG is compensated for its' advisory services by charging clients a management fee. The management fee is quoted as an annual fee and fees are billed quarterly; calculated at a rate equal to one-fourth of the annual fee. For example, the quarterly billing rate for a 1.25% annual

management fee would be 0.3125%. The quarterly fee is calculated by multiplying the quarterly rate by the account balance on the last day of the quarter. Each billing is for the upcoming quarter (billed in advance). Partial quarter billings are calculated on a pro-rata basis commencing on the day the account is funded. Fee adjustments will be made during the quarter for additional deposits to the account and partial withdrawals from the account. However, fees will not be charged on additional deposits into a cash (money market) account and no fee adjustments will be made for withdrawals from a cash account.

IFPG or IFPG clients may cancel the Investment Advisory Agreement at any time with written notice to the other party. In the event of a cancellation of the agreement prior to any services being rendered, any advance payments shall be refunded. If cancellation of the agreement is after services has started, the client shall be charged for the services completed and the remainder of any advance payments, if any, shall be refunded to the client within 30 days of the termination request. The refund will be calculated from the date of notice of termination. The client will be responsible for any fees or charges incurred by the client from third parties as a result of maintaining the account or for any securities transactions executed.

All management fees are deducted, with client permission, from the managed account. IFPG does not provide any alternative payment plans. Prior to deducting management fees, clients are mailed a fee calculation invoice, which is included in a quarterly report prepared by IFPG.

The following schedules reflect the maximum management fees IFPG can charge within each of its' advisory programs. Management fees may be negotiable at the discretion of IFPG.

<u>PROGRAM I</u>	
ACCOUNT BALANCE	ANNUAL FEE
\$25,000 to \$99,999	2.00%
\$100,000 to \$199,999	1.50%
\$200,000 to \$499,999	1.25%
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$1,999,999	0.90%
\$2,000,000 to \$2,999,999	0.80%
\$3,000,000 and over	Quoted

<u>PROGRAM II</u>	
ACCOUNT BALANCE	ANNUAL FEE
\$250,000 to \$499,999	1.40%
\$500,000 to \$749,999	1.30%
\$750,000 to \$999,999	1.20%
\$1,000,000 to \$1,999,999	1.00%
\$2,000,000 to \$2,999,999	0.90%
\$3,000,000 and over	Quoted

As of 12/31/19, mutual funds represented 18% of IFPG's assets under management (AUM). IFPG chooses between two share classes of mutual funds when placing them in client portfolios – Institutional class shares or A-Class shares.

Institutional class shares incur a transaction fee upon purchases and sells. A-Class shares do not incur transaction fees upon purchases or sells. A typical transaction fee/trading commission for a mutual fund institutional share is \$24 per trade or a total of \$48 per fund when bought and sold. Institutional class shares do, however, provide a lower annual expense ratio, typically 0.25-0.40% less than A-Class Shares. IFPG takes the transaction fee and expense ratio variance into consideration when determining which class share of mutual fund is purchased. Generally, A-Class shares are purchased when the initial investment is below \$2,500.

Individual accounts for members of the same family, defined as spouses and dependent children, are assessed fees based on the total account balance of all family members. Accounts for business entities and accounts related thereto, including those of the business owner, are assessed fees based on the total account balances of all such related persons.

Although IFPG provides services exclusively on an “assets under management” basis, a situation could arise where an hourly or fixed fee consultation may be appropriate.

No fees are charged on the basis of a share of capital gains or capital appreciation of the funds, or any portion of the funds of an advisory client, designated as non-managed.

All fees paid to IFPG for investment advisory services are separate and distinct from the fees charged by mutual funds to their shareholders, trading commissions, and/or transaction charges which may be charged by TD Ameritrade or Charles Schwab & Co. for individual securities and certain mutual funds. IFPG does not receive any portion of these fees or commissions. These fees and expenses are described in each fund’s prospectus and will generally include a management fee, other fund expenses, and/or a possible distribution fee. A client could invest in a mutual fund directly, without the services of IFPG. In that case, the client would not receive the services provided by IFPG which are designed, among other things, to assist the client in determining which mutual fund(s) are most appropriate to each client’s financial conditions and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by IFPG to fully understand the total amount of fees to be paid by the client, and to thereby evaluate the advisory services being provided.

A purchase or sell (trade) in a client account may involve an equity that is listed in the over-the-counter (OTC) market. In such transactions the client may incur other costs in addition to any commissions charged by the custodian broker-dealer when trades in OTC securities are affected on the client’s behalf through the broker-dealer on an agency basis.

Some of IFPG’s IARs hold licensing providing for brokering a commissionable product from a broker-dealer, the Morris Group, unrelated to IFPG. The ability of these IARs to receive a commission presents a conflict of interest as it can provide incentive to recommend investment products

based on compensation received, rather than a client’s needs. IFPG provides education to IARs relating to the conflict and the relevance of client needs as a priority. The conflict is disclosed to clients in the regulatory filings of IFPG and the Morris Group. Clients have the option to purchase these investment products through other brokers or agents unrelated to the IFPG IARs providing these products.

IFPG’s Chief Compliance Officer, Chad A. Bailey, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.

PERFORMANCE-BASED FEES

Neither IFPG nor any of its IARs accepts or charges performance-based fees.

TYPES OF CLIENTS

IFPG provides its advisory services to individuals and families, business entities, trusts, estates, pension and profit sharing plans, and charitable trusts.

IFPG prefers the minimum dollar amount clients commit to its’ advisory services be \$25,000. IFPG does not require a minimum time period a client account must be managed by IFPG.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS

Investment Analysis

IFPG's approach to managing investments is based upon components of Modern Portfolio Theory (MPT). These components include:

1. Asset Allocation
2. Diversification
3. Continuous Investment, not market timing
4. Common stocks are the best financial investment hedge against inflation and taxes
5. Foreign stocks have historically, at the minimum, reduced risk and in some time periods also enhanced return
6. Value stocks have historically outperformed growth stocks
7. Historically, smaller companies have outperformed larger companies

IFPG's primary investment strategy is strategic asset allocation. The strategy reflects analysis of various asset classes such as large-caps, mid-caps, small-caps, international, natural resources, and income-driven investments and periodically adjusting portfolio allocation in an effort to enhance returns. The primary risk to clients with this strategy is IFPG may overweight an asset class (or asset classes) that may underperform while underweighted asset classes are outperforming.

Selection of mutual funds included in portfolios is based on utilization of Morningstar, Inc.'s analyzed reports. The reports include data on performance, risk, manager tenure, style consistency, and rankings compared to comparable mutual funds. IFPG relies on the Morningstar data and may or may not use other sources to verify their data.

For individual stocks, IFPG utilizes both fundamental and technical analysis as well as charting data. Information comes from a variety of sources, mainly including: outside analysts, financial publications, corporate rating services, annual reports, company press releases, inspections of corporate activities, and research materials prepared by others outside of IFPG.

Our Investment Philosophies

The overall goals and objectives are the priority when establishing an investment portfolio for each client. IFPG believes in the following four core philosophies when constructing client portfolios.

- I. Peace of Mind – IFPG believes clients should be comfortable in their investment decisions. If a client is uncomfortable or worried, then an investment should not be bought. Peace of mind should always be the #1 criterion when constructing a portfolio.



- II. Preservation of Principal with Diversification – IFPG only offers “prudent” investment advisory services, which by definition mandates diversification. There is a reason the cliché, “do not put too many eggs in one basket,” has stood the test of time.



- III. Tax Efficient Strategies – Most investors do not realize how high a percentage of their investment gains can be lost to taxation over the years. IFPG makes an effort to construct tax efficient portfolios for our clients.



- IV. Reduce Investment Expenses – Like taxation, investment-related expenses negatively impact the overall performance of a portfolio. Investment decisions should not be made solely on the expense factor; however, it should be a primary consideration.



Risk of Loss

Clients have to recognize that the objectives of the overall investment portfolio cannot be achieved without incurring risk to principal.

For equity investments included in portfolios, the primary risks include stock market declines, underperformance by a company (often associated with earnings or gross revenues), and other negative events which may not be associated with a company's financial results.

For income-driven investments included in portfolios, the primary risks include interest rate increases in the general marketplace, assignment of a lower credit rating by an independent rating agency, and underperformance by the issuing company.

Past performance may not be indicative of future results. All types of investments involve some degree of risk. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies of IFPG) will be profitable or equal the corresponding indicated performance levels of common market indices. Please remember that each client is responsible for contacting IFPG if there are any changes in personal or financial situations, changes in investment objectives, or if modifying or adding any reasonable restrictions to our investment advisory services.

DISCIPLINARY INFORMATION & DISCLOSURE

IFPG has not been involved with any regulatory disciplinary actions which would be material relating to a client's, or prospective client's evaluation of IFPG.

OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS

Most of IFPG's IARs are principals or owners of their own accounting or tax practices firm and may have ownership in IFPG. Fees received by any IAR for accounting or tax services are separate and distinct from any fees earned by IFPG for its advisory services. IFPG does not share the accounting or tax fees earned by the IAR.

IFPG IARs spend the majority of their time conducting accounting and tax services.

Certain IFPG IARs are also registered representatives of the Morris Group, a broker-dealer independent of IFPG. These IARs can offer commission-based mutual funds, variable annuities, unit investment trusts, stocks, and/or bonds to clients. Although the client may choose

to implement the recommended securities transactions through any third-party broker-dealer, those IARs that are also registered representatives will recommend the Morris Group's products; provided the recommendation is consistent with IFPG's fiduciary obligations to the client. The IAR in his/her capacity as a registered representative would receive commissions from the sale of these products. IFPG does not share in these commissions.

IFPG does not engage in selecting or recommending other investment advisors to clients.

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

Our Code of Ethics

The Investment Advisory Act of 1940 imposes a fiduciary duty on investment advisers. **As a fiduciary, IFPG has a duty of utmost good faith to act solely in the best interest of our clients.** Our clients entrust us with their money and financial future, which in turn, places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity in all of our dealings. This fiduciary duty is the core principle underlying this Code of Ethics and Personal Trading Policy, and represents the expected basis of all of our dealings with our clients.

The Code of Ethics consists of following core principles and applies to all employees within our firm.

1. The interests of clients will be placed ahead of the firm's or any employee's own investment interests.
2. Employees are expected to conduct their personal securities transactions in accordance with the firm's Personal Trading Policy, and will strive to avoid any actual or perceived conflicts of interest with the client. Employees with questions regarding the appearance of a conflict with a client should consult with the Chief Compliance Officer before taking action that may result in an actual conflict.

3. Employees will not take inappropriate advantage of their position within the firm.
4. Employees are expected to act in the best interest of each of our clients.
5. Employees are expected to comply with federal securities laws. Strict adherence to these policies and other policies and procedures of the firm will assist the employee in complying with this important requirement.

As part of the required standards of conduct, supervised persons are not permitted, in any connection with the purchase or sale (directly or indirectly) of a security held or to be acquired by a client:

- a) To defraud such client in any manner;
- b) To mislead such client, including making a statement that omits material facts;
- c) To engage in any act, practice, or course of conduct which operates or would operate as a fraud or deceit upon such client;
- d) To engage in any manipulative practice with respect to such client; or
- e) To engage in any manipulative practice with respect to securities, including price manipulation.

As a fiduciary, we have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of our clients. Compliance with this duty can be achieved by trying to avoid conflicts of interest and by fully disclosing all material facts concerning any conflict that does arise with respect to any client. A copy of IFPG's code of ethics is available upon request to any client or prospective client.

Participation or Interest in Client Transactions

Neither IFPG, its' IARs, or its' employees recommends any products or securities to clients in which they may have a material interest.

Personal Trading

It is a common occurrence for IFPG IARs and IFPG employees to buy or sell the same securities being purchased or sold for client accounts. These buys and sells are executed at the same time the

purchases and sells are being executed for the client accounts. This activity could produce a conflict of interest if client transactions were executed prior to or after the IFPG related person's transactions. To avoid such a conflict of interest, the majority of these transactions are executed at the same time.

On occasion, there can be exceptions to the above procedures. The same security may be purchased for a new client who was not a client at the time of the initial purchase. The same security may also be purchased at a later date for a client because at the time of the initial purchase there was not adequate cash in the account to make the purchase. Another exception can involve the sale of a security. On occasion, we may sell the same security in all clients' qualified (IRA) accounts and then sell it at a later date in all clients' non-qualified (non-IRA) accounts; the purpose being to incur a long-term capital gain for clients in lieu of a short-term capital gain.

BROKERAGE PRACTICES

IFPG has selected and recommends TD Ameritrade as the primary broker-dealer (custodian) for execution of client transactions (buys and sells of securities). The factors IFPG considered in selecting TD Ameritrade included the reasonableness of commissions they charge. This was determined by comparing their commission charges to comparable custodians. Other factors of consideration included the availability of online access to accounts by clients, monthly statement preparation services, and prompt responses to general service issues and questions.

IFPG does quarterly testing on security trades to ensure Best Execution for the client. IFPG evaluates trading ranges for a sample of trades to ensure trades for IFPG clients are executed within this specific range. All discrepancies will be documented and reviewed with the TD Ameritrade trading department.

IFPG does receive research services and other benefits from TD Ameritrade at no cost. Collectively, these are defined as "soft dollars" in

the investment industry. These benefits are paid for by commissions earned by TD Ameritrade, including commission paid by IFPG clients.

Research services provided to IFPG includes access to reports and ratings on stocks, mutual funds, exchange traded funds (ETFs), and fixed income investments. The reports and ratings are developed by third parties including Standard & Poors, Thompson-Reuters, Vickers Insider Trading, Argus Rating, First Call, The Street Ratings, Jaywalk Consensus Reports, Ford Investor Value Graph, and Morningstar, Inc.

The research reports and ratings provide detailed financial information on individual stocks, mutual funds, and ETFs. The financial information includes earnings, ratios, charting, insider buys and sells, target prices, volatility, and analyst's ratings/opinions. Taken as a whole, the amount of information provided to IFPG is extensive. If IFPG had to purchase these services, the cost would be material.

IFPG does not attempt to allocate these soft dollar benefits solely to clients who have incurred commission expenses with TD Ameritrade. IFPG uses these benefits in the service of all client accounts.

IFPG may have an incentive to recommend TD Ameritrade based on IFPG's interest in receiving these soft dollar benefits rather than our clients receiving the most favorable execution costs. This creates a conflict of interest.

IFPG utilizes the TD Ameritrade online trading platform to direct client transactions to TD Ameritrade.

In addition to the research benefits, IFPG receives other educational and social-related benefits from TD Ameritrade. The educational benefits include invitations to attend national and regional conferences to hear speeches on various industry-related topics. There is no charge to IFPG personnel to attend.

Social benefits provided for IFPG and paid for by TD Ameritrade include one or two rounds of golf each year and a day at the Indianapolis Motor Speedway during the month of May.

IFPG personnel participating in the above educational and social benefits do pay for all travel and lodging expenses incurred with these functions.

REVIEW OF ACCOUNTS

In accordance with our Investment Advisory Agreement, IFPG reviews each client's portfolio on a quarterly basis. The review is the responsibility of the IFPG Manager, Chad A. Bailey. In addition, each client's investment adviser representative is responsible for monitoring the client's statements and meeting with the client, or conferring by telephone no less than semi-annually. More frequent reviews may be triggered by material market, economic, political, and/or world events, or by a change in client's circumstances.

IFPG provides each client with a written quarterly report which summarizes their portfolio position analysis, including: description, weight, cost basis, current value, cumulative return, and annual return. In addition, the client will receive monthly statements from the account custodian.

CLIENT REFERRALS & OTHER COMPENSATION

IFPG does not receive any economic benefits from any non-clients for executing advisory services to our clients. IFPG does not pay any client referral fees to any unsupervised individuals.

Currently, the IARs of IFPG are also IFPG owners. None of the IARs have a principal amount of ownership. For their services, each such representative owner is compensated with a portion of IFPG's investment advisory fee that is charged to the client. As such, the representative owners can be considered affiliated solicitors of IFPG and receive this fee pursuant to Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law rules. All such compensation paid to such representative owners

shall be paid solely from IFPG's investment advisory fee, and shall not result in any additional charge to the client. Each IFPG representative shall disclose the nature of his/her relationship to prospective clients at the time of the introduction, and will provide all prospective clients with a copy of this brochure disclosure.

CUSTODY OF CLIENT FUNDS

As of June 30, 2011, IFPG retains no custody of client funds as defined by the SEC. Prior to that date, a few clients had authorized IFPG to manage their 401(k) accounts held by their employer's 401(k) custodian, Fidelity Investments. These clients received separately prepared quarterly statements from Fidelity and IFPG. These clients were urged to compare the statements when received. These 401(k) accounts previously managed by IFPG represented less than 1.5% of the total assets managed by IFPG.

INVESTMENT DISCRETION

IFPG provides its advisory services on a discretionary basis. Clients provide IFPG this authority by executing a limited power of attorney (LPOA) upon signing new account applications. The LPOA and related services are explained to the client when the account applications are completed.

Clients may request limitations on IFPG's authority. Typically, these represent not investing in specific securities, specific industries, or not selling a security that has been transferred into an account managed by IFPG.

VOTING CLIENT SECURITIES

IFPG has adopted the following policies and procedures regarding proxy voting for its clients' accounts.

To initiate the process of voting proxies for its clients, IFPG has determined that its internal costs would increase significantly and would probably result in increased fees for most clients. IFPG does not feel that this is an area that is materially

important to its business, or is in the best interest of its clients since this additional expense would be passed along in increased management fees. Therefore, IFPG has chosen not to retain voting authority over its clients' proxy voting and has left the voting authority to the clients.

All proxy ballots will be sent directly to the client and not to IFPG. Should the client seek advice on how to vote their proxies, they may do so by contacting IFPG at (317) 818-1776.

FINANCIAL INFORMATION

IFPG does not require or solicit prepayment amounts from clients.