

# Irving Advisory Group, LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Irving Advisory Group, LLC. If you have any questions about the contents of this brochure, please contact us at (760) 744-7433 or by email at: [Justin@irvingfinancial.com](mailto:Justin@irvingfinancial.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 Irving Advisory Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Irving Advisory Group, LLC's CRD number is: 160169*

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

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## **Item 2: Material Changes**

There are no material changes in this brochure from the last annual updating amendment of Irving Advisory Group, LLC on 02/18/2020. Material changes relate to Irving Advisory Group, LLC's policies, practices or conflicts of interests only.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Irving Advisory Group, LLC is a Limited Liability Company organized in the state of California.

This firm was formed in January 2012, and the principal owner is Justin T. Irving.

### B. Types of Advisory Services

Irving Advisory Group, LLC (hereinafter "IAG") offers the following services to advisory clients:

#### *Selection of Other Advisers*

IAG may direct clients to third-party investment advisers. Before selecting other advisers for clients, IAG will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where IAG is recommending the adviser to clients.

#### *Financial Planning*

Financial Planning is also offered as a part of IAG's service to their clients for no additional fee.

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

IAG generally limits its investment advice and/or money management to mutual funds, bonds, fixed income, ETFs, mutual funds, insurance products including annuities. IAG may use other securities as well to help diversify a portfolio when applicable.

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

IAG offers the same suite of services to all of its clients Client suitability will be obtained from every client.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent IAG from properly servicing the client account, or if the restrictions would require IAG to deviate from its standard suite of services, IAG reserves the right to end the relationship.

## D. Wrap Fee Programs

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

## E. Amounts Under Management

IAG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$15,143,967.00	\$0.00	December 2020

# Item 5: Fees and Compensation

## A. Fee Schedule

### *Selection of Other Advisers Fees*

IAG may direct clients to third-party investment advisers. IAG will be compensated via a fee share from the advisers to which it directs those clients. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

IAG may specifically direct clients to BAM Retirement Solutions/Loring Ward or Matson Money. The annual fee schedule is as follows:

Total Assets	IAG's Fee	TPMM's Fee	Total Fee
\$1 - \$500,000	0.99%	0%	0.99%
\$500,001 - \$1,000,000	0.80%	0%	0.80%
\$1,000,001 - \$1,500,000	0.70%	0%	0.70%

The value of the account as of the last business day of the prior quarter is used for purposes of calculating the advisory fee. These fees are negotiable and are separate from the expense ratio (0.32% - 0.49% annually) associated with the BAM Retirement Solutions/Loring Ward or Matson Money mutual funds in which the portfolio will be invested. BAM Retirement Solutions/Loring Ward expense ratio will be lower on accounts over \$500,000. BAM Retirement Solutions/Loring Ward and Matson Money do not receive any advisory fee; They are compensated solely via the expense ratio associated with its mutual funds. The expense ratio is explained in the prospectus.

## **B. Payment of Fees**

### ***Payment of Selection of Other Advisers Fees***

Fees for selection of BAM Retirement Solutions/Loring Ward or Matson Money as third-party advisers are withdrawn by BAM Retirement Solutions/Loring Ward or Matson Money directly from client accounts. IAG then receives its portion of the fees from BAM Retirement Solutions/Loring Ward or Matson Money; IAG does not directly deduct the advisory fees.

## **C. Clients Are Responsible For Third Party Fees**

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

## **D. Prepayment of Fees**

BAM Retirement Solutions/Loring Ward and Matson Money collects fees in advance. The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the month/quarter up to and including the day of termination. (\*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination month/quarter).

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

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

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

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

## **Item 7: Types of Clients**

IAG generally provides investment advice and/or management supervisory services to the following types of clients:



- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Corporations or Business Entities

### *Minimum Account Size*

There is no account minimum.

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

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

IAG's methods of analysis include fundamental analysis and technical analysis.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

*Technical analysis* involves the analysis of past market data; primarily price and volume.

#### *Investment Strategies*

IAG uses long term trading, and selection of other advisers

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

### **B. Material Risks Involved**

#### *Methods of Analysis*

*Fundamental analysis* concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

*Technical analysis* attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

#### *Investment Strategies*

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Although IAG will seek to select only money managers who will invest clients' assets with the highest level of integrity, IAG's selection process cannot ensure that money managers will perform as desired and IAG will have no control over the day-to-day operations of any of its selected money managers. IAG would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

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

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

IAG generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk (the uncertainty that inflation will undermine the performance of the investment), interest rate risk (the risk that the value of an investment will change due to the absolute interest rate level), default risk (the risk associated with a company or individual failing to repay their debt obligations), etc.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**Real Estate** funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend to have a greater effect on funds that are more growth-oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

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

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

## **Item 9: Disciplinary Information**

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

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

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

In July 2000, Justin T. Irving was found in violation of Conduct Rule 2110 of the NASD in the connection with the offer and sale of certificates of deposits. Mr. Irving was censured and fined \$5,000. More information about this event can be found at <http://www.adviserinfo.sec.gov>.

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

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

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

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

Neither IAG nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

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

Justin T. Irving is President/Owner of Irving Financial & Insurance Solutions, an insurance agency.

Justin T. Irving is President/Owner of Irving Tax & Financial, a Tax Preparation and Tax Planning firm.

Justin T. Irving is an insurance agent and an enrolled agent for tax preparation services. From time to time, he will offer clients advice or products from those activities. Clients should be aware that insurance services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. IAG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of IAG in their outside capacities.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code 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.

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

IAG has entered into a co-advisory agreement with BAM Retirement Solutions/Loring Ward and Matson Money, unaffiliated money managers, under which it recommends on a nondiscretionary basis that clients open an account in an advisory program offered by BAM Retirement Solutions/Loring Ward or Matson Money. In using third party advisers, there is a conflict of interest in that IAG would have an incentive to direct clients to third-party investment advisers that provide IAG with a larger fee split. This is mitigated because BAM Retirement Solutions/Loring Ward and Matson Money charges no separate advisory fee of its own for the asset allocation services it provides to accounts participating in the BAM Retirement Solutions/Loring Ward or Matson Fund Platform. Instead, BAM Retirement Solutions/Loring Ward or Matson Money will be compensated via the expense ratio associated with the BAM Retirement Solutions/Loring Ward or Matson Fund Platform; BAM Retirement Solutions/Loring Ward and Matson Money also collects the IAG advisory fee directly from the custodian and then remits that advisory fee to IAG. Moreover, IAG will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. IAG will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where IAG is recommending the adviser to clients.

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

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

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

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

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

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

From time to time, representatives of IAG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of IAG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. IAG will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

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

From time to time, representatives of IAG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of IAG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. IAG will always transact client's transactions before its own when similar securities are being bought or sold.

## Item 12: Brokerage Practices

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

The Custodian, Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD # 5393), was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. IAG will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

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

IAG receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions (“soft dollar benefits”). There is no minimum client number or dollar number that IAG must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for IAG to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for services or products it has an incentive to choose a custodian that provides those services based on its interests rather than the clients’ interests. The first consideration when recommending broker/dealers to clients is best execution. IAG always acts in the best interest of the client.

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

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

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

IAG will not allow clients to direct IAG to use a specific broker-dealer to execute transactions. Clients must use IAG recommended custodian (broker-dealer).

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

IAG does not aggregate or bunch the securities to be purchased or sold for multiple clients, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Reviews of Accounts**

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

Client accounts are reviewed at least quarterly only by Justin T. Irving, Managing Member. Justin T. Irving is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at IAG are assigned to this reviewer.

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

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

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

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Clients are provided a quarterly report regarding each account, including a breakdown of the assets in the account as well as the performance for that quarter, and year to date from BAM Retirement Solutions/Loring Ward or Matson Money.

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

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

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

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

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

## **Item 15: Custody**

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

## **Item 16: Investment Discretion**

IAG does not have discretion over client accounts at any time.

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

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

## **Item 18: Financial Information**

### **A. Balance Sheet**

IAG does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

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

Neither IAG nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

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

IAG has not been the subject of a bankruptcy petition in the last ten years.



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

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

IAG currently has only one management person/executive officer; Justin T. Irving. Justin T. Irving's education and business background can be found on the Supplemental ADV Part 2B form.

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

Justin T. Irving's other business activities can be found on the Supplemental ADV Part 2B form.

### **C. How Performance Based Fees are Calculated and Degree of Risk to Clients**

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

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

In July 2000, Justin T. Irving was found in violation of Conduct Rule 2110 of the NASD in the connection with the offer and sale of certificates of deposits. Mr. Irving was censured and fined \$5,000. More information about this event can be found at <http://www.adviserinfo.sec.gov>.

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

Neither IAG, nor its management persons, has any relationship or arrangement with issuers of securities.