

Assurity Advisors, Inc.

Solutions for Your Retirement

ADV and Privacy Statement



IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT:

In accordance with the US Patriot Act, we are required to verify your identity. To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person or entity that opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information pertaining to you or your business that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Uniform Application for Investment Advisor Registration

Name of Investment Advisor: Assurity Advisors, Inc.			
Address	Lincoln	NE	Area Code Telephone Number
4000 Pine Lake Road		68516	(800) 284-8576

This part of Form ADV gives information about the investment advisor
and its business for the use of clients.
The information has not been approved or verified by any governmental authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies,
and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not
required to respond unless the form displays a currently valid OMB control number.

1. A. **Advisory Services and Fees.** For each type of service provided, state the (check the applicable boxes) approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- ☒ (1) Provides investment supervisory services 52 %
☒ (2) Manages investment advisory accounts not involving investment supervisory services ... 48 %
☐ (3) Furnishes investment advice through consultations not included in either service described above _____ %
☐ (4) Issues periodicals about securities by subscription _____ %
☐ (5) Issues special reports about securities not included in any service described above _____ %
☐ (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities. _____ %
☐ (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities _____ %
☐ (8) Provides a timing service _____ %
☐ (9) Furnishes advice about securities in any manner not described above _____ %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- B. Does applicant call any of the services it checked above financial planning or some similar term? ☐ Yes ☒ No

- C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

- D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the advisor on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date.

2. **Types of Clients** - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input checked="" type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input type="checkbox"/> A. Equity securities | <input type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> (1) exchange-listed securities | |
| <input type="checkbox"/> (2) securities traded over-the-counter | I. Options contracts on: |
| <input type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | J. Futures contracts on: |
| | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> C. Corporate debt securities
(other than commercial paper) | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | K. Interests in partnerships investing in: |
| <input type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (2) oil and gas interests |
| | <input type="checkbox"/> (3) other (explain on Schedule F) |
| G. Investment company securities: | <input checked="" type="checkbox"/> L. Other (explain on Schedule F) |
| <input type="checkbox"/> (1) variable life insurance | |
| <input type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| <input type="checkbox"/> (1) Charting | <input checked="" type="checkbox"/> (4) Cyclical |
| <input checked="" type="checkbox"/> (2) Fundamental | <input type="checkbox"/> (5) Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (3) Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> (1) Financial newspapers and magazines | <input checked="" type="checkbox"/> (6) Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| <input type="checkbox"/> (2) Inspections of corporate activities | <input checked="" type="checkbox"/> (7) Company press releases |
| <input checked="" type="checkbox"/> (3) Research materials prepared by others | <input type="checkbox"/> (8) Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (4) Corporate rating services | Timing services |
| <input type="checkbox"/> (5) | |

C. The investment strategies used to implement any investment advice given to clients include:
(check those that apply)

- | | |
|--|---|
| <input checked="" type="checkbox"/> (1) Long-term purchases
(securities held at least a year) | <input type="checkbox"/> (5) Margin transactions |
| <input type="checkbox"/> (2) Short-term purchases
(securities sold within a year) | <input type="checkbox"/> (6) Option writing, including covered options,
uncovered options, or spreading strategies |
| <input type="checkbox"/> (3) Trading
(securities sold within 30 days) | <input type="checkbox"/> (7) Other (explain on Schedule F) |
| <input type="checkbox"/> (4) Short sales | |

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ☒ Yes ☐ No
(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading advisor.

C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

- | | |
|---|---|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment advisor | <input checked="" type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading
adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited
partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? ☐ Yes ☒ No

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☒ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. Conditions for Managing Accounts.

Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? ☐ Yes ☒ No
(If yes, describe on Schedule F.)

11. Review of Accounts.

If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. For reviews, include their frequency, different levels, and triggering factors. For reviewers, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Each Qualified Plan Participant and IRA Owner account is periodically reviewed no less than every eighteen months by an investment adviser representative in the employment of Assurity Advisors Inc. Periodic reviews are available at a client's request and may be conducted as frequently as quarterly. Account reviews are all inclusive including but not limited to risk tolerance, asset allocation, time horizon, and other individualized factors. More frequent reviews may be triggered by material changes such as:

1. Adverse market conditions
2. Unstable political or social environment
3. Material change in investment management for any Assurity Advisors investment strategy.

Assurity Advisors employs two Investment Advisor Representatives that conduct reviews for 2,986 participant and IRA accounts. An Investor Profile is maintained on file for each participant that provides a basis for the initial direction of a review. The associates responsible for account reviews are as follows:

Tamara T. Uribe, CRPC — Senior Investment Advisor Representative
Thomas J. Albin — Investment Advisor Representative

While the underlying securities within Investment Supervisory Services client's portfolios are continuously monitored, each Investment Strategy offered by Assurity Advisors will be reviewed at least quarterly by the Assurity Advisors Investment Committee. Recommendations of the Investment Committee are approved by the Assurity Advisors Board of Directors. (See Schedule F, Item 6 for the listing of Directors and Committee Members).

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Assurity Advisors will provide to Plan Sponsors a quarterly statement containing a detail of all account activity including earnings, market gains or losses, and fees charged to the plan.

Assurity Advisors will provide to each Participant a quarterly report containing roll forward summary of activity to the account and ending market value. Summary activity includes contributions, withdrawals, transfers, earnings and losses, and fees charged to the account.

12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold? ☒ Yes ☐ No
(2) amount of the securities to be bought or sold? ☒ Yes ☐ No
(3) broker or dealer to be used? ☒ Yes ☐ No
(4) commission rates paid? ☒ Yes ☐ No

- B. Does applicant or a related person suggest brokers to clients? ☐ Yes ☒ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non research services) from a non-client in connection with giving advice to clients? ☐ Yes ☒ No

- B. directly or indirectly compensates any person for client referrals? ☒ Yes ☐ No
(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and six or more months in advance.

Has applicant provided a Schedule G sheet? ☒ Yes ☐ No

Schedule F of Form ADV

1. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: Assurity Advisors, Inc.	IRS Empl. Ident No.: 47-0807584
Item of Form (Identify)	Answer
1	<p><u>INVESTMENT SUPERVISORY SERVICES</u></p> <p>Assurity Advisors, Inc. provides investment supervisory services to Individuals, (referred to herein as "Participant") and Qualified Retirement Plans, (referred to herein as "Client"). These services are defined as giving continuous advice to and making investment recommendations for a client or participant based on the client's or participant's needs.</p> <p>Assurity Advisors implements an asset allocation program that is designed to provide each Participant with an asset allocation model that reflects his/her objectives, risk tolerance and financial profile. In developing this program, registered investment advisor representatives assist each Participant in determining suitability, establishing appropriate objectives and opening the Participant's account. Assurity Advisors may refer some portion of the Qualified Retirement Plan accounts to independent investment managers for a portion of the management service fees. Assurity Advisors retains the discretionary authority to hire and terminate these independent investment managers.</p> <p>In the course of developing an asset allocation each Client/Participant will be able to impose reasonable investment restrictions on the management of the account. Assurity Advisors will allocate the asset weighting among various market sectors or classifications, taking into consideration factors such as time horizon, liquidity needs, regulatory issues, as well as each Client/Participant's special considerations.</p> <p>Securities investment transactions are processed daily by Assurity Advisors. Current Custodians utilized by Assurity Advisors, Inc.:</p> <ul style="list-style-type: none"> • <i>Union Bank and Trust Company</i>: A commercial bank utilized for short-term processing of uninvested client funds; • <i>Matrix Settlement and Clearance Services LLC</i>: utilized for trade and settlement of mutual fund and collective investment trust shares; • <i>Mutual Fund companies</i>: custodian for the investment of Client and Participant assets. • <i>MG Trust Company, LLC</i>: custodian for Collective Investment Trusts • <i>Ameritas Life Insurance Corp</i>: custodian of the Guaranteed Investment Account, a proprietary investment • <i>United Heritage Financial Group, Inc.</i>: custodian of the United Heritage Fixed Income Fund, a proprietary fixed annuity • <i>Assurity Life Insurance Company</i>: custodian of the Assurity ABC Annuity, a proprietary fixed annuity <p>Assurity Advisors will be reasonably available to consult with each client, and each client will retain proof of ownership of the funds and securities in the client's account, such as the ability to withdraw or vote securities.</p> <p><u>PENSION CONSULTING SERVICES</u></p> <p>In addition, Assurity Advisors provides comprehensive compliance and record keeping services to ERISA plan sponsors. These services include, but are not limited to, plan design, plan installation, client enrollment, education, compliance testing, IRS and DOL report completion and Trust services.</p>

1. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: Assurity Advisors, Inc.		IRS Empl. Ident No.: 47-0807584
Item of Form (Identify)	Answer	
1 (cont.)	<p><u>ADMINISTRATIVE FEE STRUCTURE</u></p> <p>ERISA plan compliance and record keeping services will be charged as follows: Fixed annual fee range: \$500 - \$3,000; Per participant annual fee: \$5 - \$25</p> <p><u>MANAGEMENT FEE STRUCTURE</u></p> <p>Normally, annualized fees for equity accounts or accounts with less than \$5 million in assets, are set at a maximum of 1.5%, with discounts applying to larger accounts.</p> <p>Fees and charges will be noted on the client's statements. There are no sales charges incurred when investing with Assurity Advisors. Assurity Advisors does not receive any brokerage commissions associated with the investment company securities transactions in advisory client accounts. Fees are not charged as a percentage of capital gains or capital appreciation of the funds or any portion of the funds of an advisory account. Fees will be charged on the account as a whole.</p> <p>Management fees will be calculated at the end of each period (monthly or quarterly). These fees will be based on the average daily balance (ADB) of the assets under management in the Client's/Participant's account for <u>that period</u>. The ADB for the account is the total of each day's market value divided by the number of days in the billing period.</p> <p>Assurity Advisors notifies Clients/Participants of any fee deducted as a transaction which may be viewed on the Web site. Additionally, Assurity Advisors will send the client a quarterly statement that will show the beginning and ending balance, the computed fee, adjustments, explanations and the net fee which was deducted. A client account may be canceled at any time by any of the parties, for any reason, upon receipt of written notice. All fees charged by Assurity Advisors will be charged in arrears. As a result, upon termination of an account, there will never be refundable fees.</p> <p><u>ADDITIONAL INFORMATION ON FEES</u></p> <p>The type of plan, number of participants and plan asset size are all factors considered when determining fees. These fees are negotiable under certain circumstances.</p> <p>All fees paid to Assurity Advisors for investment advisory services are separate and distinct from the fees and expenses charged by third parties other than Assurity Advisors, or Independent Investment Adviser's in connection with investments placed in or made through the client's account.</p> <p>Additional fees may include, but are not limited to, management fees, mutual fund 12(b)-1 fees, transfer fees, IRA or qualified retirement plan fees and bank custodial fees. Brokerage commissions are waived in the account; however, transaction charges may be passed on to the client. Details regarding each mutual fund's fees and expenses can be found in the fund prospectus.</p> <p><u>PROXY VOTING PROCEDURES</u></p> <p>Under the Investment Advisory Act of 1940, Assurity Advisors, Inc. has a fiduciary obligation to its clients when they (Assurity Advisors) have authority to vote proxies on behalf of the client. Proxy votes will be analyzed on an individual basis and decided on by an authorized individual.</p> <p>If Assurity Advisors receives multiple proxies on behalf of clients for a particular mutual fund, it is possible that those proxies will provide for a default "vote" if no vote is actually cast. In that situation, Assurity Advisors will vote only for the first proxy received so long as no conflict of interest exists and such default vote is in the best interests of the client.</p>	

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Item of Form (Identify)	Answer	
3	<p><u>OTHER TYPES OF INVESTMENTS</u></p> <p>In addition to offering advice on mutual fund investments, Assurity Advisors, Inc. also offers advice regarding one Guaranteed Investment Account (GIA) and two Group Annuities. The GIA is issued by Ameritas Life Insurance Company and the Group Annuities are issued by United Heritage Insurance Company or Assurity Life Insurance Company.</p>	
5	<p><u>EDUCATION & BUSINESS STANDARDS</u></p> <p>Assurity Advisors requires that persons in an advisory function within the firm possess, minimally, a college degree and/or appropriate business or industry experience. In addition, Assurity Advisors requires all those operating in an advisory function to maintain appropriate industry designations.</p>	
6	<p><u>EDUCATION AND BUSINESS BACKGROUND</u></p> <p>KEVIN WAYNE HAMMOND Born: 1960 Vice President; Member of Board, Director; and Investment Committee Member, 11/97 to present</p> <p>Education Graduated from the University of Nebraska in 1983 with a BS in Business Administration-Finance. Graduated from the University of Nebraska in 1988 with a MA in Business Administration-Finance.</p> <p>Employment History and Business Background Sr. Director, Investments, Assurity Life Insurance Company from 01/06 to present. Vice President and CIO, Security Financial Life Insurance Co., from 06/83 to 12/05. Member of Advisory Committee, Heartland Capital Fund, Inc., Private Venture Capital, from 07/84 to 12/03.</p> <p>WILLIAM RAY SCHMEECKLE Born: 1955 President; 12/06 to present, Member of Board, Director; and Investment Committee Member 11/97 to present</p> <p>Education Graduated from the University of Nebraska in 1977 with a BS in Business Administration.</p> <p>Employment History and Business Background CIO, Assurity Life Insurance Company, from 01/06 to present. CFO, Security Financial Life Insurance Co., from 07/00 to 12/05. Mortgage Loan Officer, Security Financial Life Insurance Company, from 1989 to 07/00</p> <p>DAVID THEES WALLMAN Born: 1949 Member of the Board, Director, 11/97 to present</p> <p>Education Graduated from Dana College, Blair, NE., in 1971 with a BA in Mathematics.</p> <p>Employment History and Business Background Senior Vice President & Chief Actuary, Security Financial Life Insurance Co, from 08/78 to 12/05. Senior Vice President & Chief Actuary, Assurity Life Insurance Company, from 01/06 to present.</p>	

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6 (cont.)	<p>MARVIN P. EHL Born: 1954 Secretary and Treasurer; Member of the Board, Director</p> <p>Education Graduated from Kearney State College in 1976 with a BS in Education. Graduated from University of Nebraska in 1981 with a MS</p> <p>Employment History and Business Background Vice President, Chief Financial Officer, Assurity Life Insurance Company, from 01/06 to present. Vice President Corporate Finance, Chief Financial Officer, Treasurer, and Appointed Actuary, Assurity Life Insurance Co., from 01/01 to 12/05. Member of Society of Actuaries Member of American Academy of Actuaries</p> <p>CAROL S. WATSON Born: 1952 Chief Compliance Officer</p> <p>Education Graduated from University of Nebraska-Lincoln in 1976 with Juris Doctor Graduated from University of Nebraska-Omaha in 1974 with a B.A. in Political Science</p> <p>Employment History and Business Background Vice President, General Counsel & Corporate Secretary, Assurity Life Insurance Company, from 01/06 to present. General Counsel & Vice President, Law & Planning, Assurity Life Insurance Co., from 03/03 to 01/06. Senior Vice President, Sales Administration, Lincoln Benefit Life Co., from 06/01 to 01/03.</p> <p>TODD W. REIMERS Born: 1960 Member of the Board, Director</p> <p>Education Graduated from University of Nebraska in 1983 with a B.A. in Economics</p> <p>Employment History and Business Background Senior Vice President, Chief Marketing Officer, Assurity Life Insurance Company, from 12/05 to present. Vice President – Retirement Plans, Ameritas Life Insurance Company, from 06/04 to 12/05. Vice President – Group Sales, Ameritas Life Insurance Company, from 05/98 to 06/04.</p>	

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6 (cont.)	<p>VICTOR D. WEBER Born: 1962 Assurity Advisors Inc. Investment Committee Member</p> <p>Education Graduated from the Nebraska Wesleyan University in 1984 with a BS in Business Administration-Economics Graduated from the University of Chicago in 1986 with an MBA in Finance Chartered Financial Analyst achieved in 1989</p> <p>Employment History and Business Background Senior Director, investments - Woodman Life Insurance Company, from 06/86 to 10/03 Senior Director, Investments - Assurity Life Insurance Company, (formerly Woodman Life Insurance Company) from 10/03 to present</p> <p>JOSEPH J. MICK Born: 1974 Assurity Advisors Inc. Investment Committee Member</p> <p>Education Graduated from the Nebraska Wesleyan University in 1996 with a BS in Business Administration-Finance Graduated from the University of Nebraska, Lincoln in 2002 with a MBA in Finance</p> <p>Employment History and Business Background Senior Investment Analyst & Asst Treasurer-Woodman Life Insurance Company 06/1996 to 10/2003 Senior Investment Analyst & Asst Treasurer-Assurity Life Insurance Company (formerly known as Woodman Life Insurance Company) 10/2003 to 2008 Senior Investment Analyst-Assurity Life Insurance Company 2008 to present</p> <p>STEVEN H. HILL Born: 1957 Assurity Advisors Inc. Investment Committee Member</p> <p>Education Graduated from the University of Nebraska, Lincoln in 1980 with a BS in Business Administration-Finance</p> <p>Employment History and Business Background Senior Director, Real Estate Lending & Investments-Assurity Life Insurance Company 2002 to present Chief Investment Officer-Lincoln Direct Life Insurance Company 1990 to 2002 Fixed Income Sales/Research-First Mid-America/Paine Weber 1982 to 1990 Credit Analyst-First National Bank of Kansas City 1980 to 1982</p>	
7	<p><u>OTHER BUSINESS ACTIVITIES</u></p> <p>Assurity Advisors is a registered Trust company. Assurity Advisors will serve as trustee to certain qualified retirement plans.</p>	

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7 (cont.)	<p>In addition to offering investment advice, Assurity Advisors is also a provider of retirement plan administration services. These services include compliance testing, reporting form preparation, and plan accounting. Individuals responsible for providing administrative services spend 100% of their time in this function. Those who provide investment advice to Assurity Advisors' clients will spend as much as 80% of their time on Assurity Advisors advisory activities.</p> <p>The officers and directors of Assurity Advisors are also dually employed as officers or directors of Assurity Life Insurance Company. Several of Assurity Advisors' officers are on the board of directors of various other businesses and non-profit entities. Assurity Advisors will ensure that any necessary procedures are developed to prevent the movement of material, non public information between Assurity Advisors and those other entities.</p>	
8	<p><u>OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS</u></p> <p>Assurity Life Insurance Company is the parent company of AAI and provides life and health insurance services. Persons associated with Assurity Advisors may be agents and/or brokers of Assurity Life Insurance Company. These individuals will be able to effect insurance recommendations for any client electing to have insurance recommendations implemented. It is understood that these individuals will be able to receive separate and typical compensation for insurance and/or annuity implementation. Clients are not obligated to utilize any of these individuals for insurance product purchases.</p>	
9	<p><u>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</u></p> <p>The executive officers and/or employees of Assurity Advisors may also be registered representatives of Capital Financial Services, Inc., of Minot, ND., a NASD registered broker dealer. As such, these individuals, in their separate capacities as registered representatives, will be able to effect securities transactions and will receive separate, yet customary compensation for effecting any securities transactions. The executive officers and other employees, as licensed registered representatives of broker dealers and as insurance agents or brokers of various insurance companies, are able to effect securities transactions and/or purchase insurance products for any client. However, clients are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.</p> <p>No Assurity Advisors employee may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. As a result of having this policy in place, no Assurity Advisors employees will benefit from transactions placed on behalf of advisory accounts. Assurity Advisors or individuals associated with Assurity Advisors may buy or sell securities identical to those recommended to customers for their personal accounts. Additionally, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. Assurity Advisors has established the following restrictions in order to ensure its fiduciary responsibilities in the event of a conflict of interest:</p> <p>1. A director, officer or employee of Assurity Advisors shall not buy or sell securities for their personal portfolio where their decision is substantially derived, in whole or part, by reason of his/her employment unless the information is also available to the investing public on reasonable inquiry. No person of Assurity Advisors shall prefer his/her own interest to that of an advisory client.</p>	

1. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: Assurity Advisors, Inc.		IRS Empl. Ident No.: 47-0807584
Item of Form (Identify)	Answer	
9 (Cont.)	<p>2. Assurity Advisors maintains a list of all security holdings for itself and anyone associated with this advisory practice who has access to advisory recommendations. These security holdings are reviewed on a regular basis by an officer of Assurity Advisors.</p> <p>3. All clients are fully informed that certain individuals may receive separate compensation when effecting transactions.</p> <p>4. Assurity Advisors requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.</p> <p><u>CODE OF ETHICS</u></p> <p>A Code of Ethics ("Code") has been adopted by Assurity Advisors, Inc. and is designed to comply with Rule 204A-1 under the Investment Advisors Act of 1940 ("Advisers Act"). The Code is designed to ensure that the high ethical standards long maintained by Assurity Advisors, Inc. continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee. If you would like a copy of our Code, please call Assurity Advisors, Inc. at 800-284-8576.</p>	
12	<p><u>INVESTMENT OR BROKERAGE DISCRETION</u></p> <p>For discretionary clients, Assurity Advisors requests that written authority be provided to determine which securities and the amounts of securities bought or sold, and the broker dealer to use for client transactions and commissions cost that will be charged to our clients for these transactions. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change these limitations as required. Such amendments shall be submitted in writing. Assurity Advisors does not currently exercise investment or brokerage discretion as to amounts of securities bought or sold.</p>	
13	<p><u>ADDITIONAL COMPENSATION</u></p> <p>Assurity Advisors enters into agreements with referring parties to obtain referred clients. Assurity Advisors may compensate, either directly or indirectly, any person (defined as a natural person or company) for client referrals. Assurity Advisors is aware of the special considerations promulgated under section 206(4)-3 of the Investment Advisors Act of 1940. As such, appropriate disclosure shall be made prior to or at the time of entering into Assurity Advisors investment advisory agreements, all written instruments will be maintained by Assurity Advisors as well as the referring parties, and all applicable Federal and/or State laws will be observed.</p> <p>If a referred client enters into an investment advisory agreement with Assurity Advisors, a cash referral fee is paid to the referring party, which is based upon a percentage of the client advisory fees that are generated. The referral agreements will not result in any additional charges to clients who are referred to Assurity Advisors.</p> <p>Assurity Advisors promotes a non-cash compensation program for IARs associated with or producing for AAI in the form of an invitation to attend the annual Assurity Producers' conference. Qualification is based on an IAR's annual volume of new client contributions. The acceptance and attendance for an IAR who is associated with a broker/dealer is contingent upon the policies and Code of Ethics of their broker/dealer.</p>	

Schedule G of Form ADV

Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:
Assurity Advisors, Inc.

IRS Empl. Ident. No.:
47-0807584

The Audited Balance Sheet of Assurity Advisors Inc. for December 31, 2008 will be provided free of charge upon written request. Requests in writing may be sent to:

By Mail:

Assurity Advisors Inc.
Attn: Tamara T. Uribe
PO Box 84310
Lincoln, NE 68501-4310

By E-mail:

assurityadvisors@assurity.com

Rule 204-3(c) of the Investment Advisors Act of 1940

Assurity Advisors, Inc.

Solutions for Your Retirement

Privacy Statement



Privacy Statement - Assurity Advisors, Inc.

This statement is being provided to you pursuant to the requirements of federal and state laws or regulations addressing the privacy and non-public personal consumer information which includes financial and health information. This statement details the privacy policy of Assurity Advisors, Inc., as it relates to your non public personal information that we have access to. We reserve the right to change the privacy policy of Assurity Advisors, Inc., and if the policy is changed, you will receive a revised statement and will be provided an opportunity to opt out of our policy and prohibit us from disclosing in the future the information to nonaffiliated third parties. We will also provide an annual statement to our customers summarizing our privacy policy. If two or more customers are named on one account, we may send only one statement to the customers jointly.

Information Collected - We may collect non public personal information about you from the following sources:

- Information we receive from you through our registered representatives or investment advisors or other individuals, on applications, financial planning forms, or interviews, such as salary information, assets and liabilities, and identifying information, such as name, address and Social Security number;
- Information about your transactions with us, such as information about trading history and account balances;
- Information from other interactions with Assurity Advisors, Inc., such as discussions with our customer services staff or entry of information into our interactive tools or Web site access;
- Information received from other sources with your consent or with the consent of your representative/advisor (for example, from other institutions if you transfer positions into Assurity Advisors, Inc.).

Disclosure Policy

Financial Information - We do not disclose, nor wish to reserve the right to disclose, non public personal or financial information about you to nonaffiliated third parties, except as permitted by law. The protection of your personal non public financial information is very important to us, and we are committed to protecting such information.

Privacy Policy - Assurity Advisors, Inc.

- **Former customers** - We do not disclose, nor wish to reserve the right to disclose, non public personal information about former customers except as permitted by law.
- **Service Providers/Joint Marketing Agreements** - We may disclose as permitted by law all or some of the information we collect as described above to companies that perform services on our behalf such as third-party administrators, service providers to complete a transaction you request, printing and mailing companies, general securities clearinghouse, or to others to service your account. The agreements with third-party service providers prohibit the third party from disclosing or using the information other than to carry out the function on our behalf for which the information was collected by them or disclosed to them.
- **Fair Credit Reporting Act** - We do not disclose customer financial information to others related to us by common ownership or affiliated with us by corporate control except as permitted by law, pursuant to the federal Fair Credit Reporting Act.
- **Access to Confidential Information** - We restrict access to non public personal information about you to those employees who need to know that information for a business purpose to provide products and services to you. We maintain physical, electronic, and procedural safeguards that comply with requirements to guard your non public personal information and continually review our policies and practices, monitor our computer networks and test the strength of our security in order to help us ensure the safety of customer information. We maintain policies about the proper physical security of workplaces and records.

**If you have any questions regarding this statement,
please contact us at Assurity Advisors, Inc., 800-284-8576.**

Assurity Advisors, Inc.

PO Box 84310

Lincoln, NE 68501

800.284.8576

www.assurityadvisors.com