

Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Askar Advisors Group, Inc. If you have any questions about the contents of this Brochure, please contact us at (952) 854-9463 and/or Mary@Askar.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 Askar Advisors Group, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Askar Advisors Group, Inc. is 119330.

Any references to Askar Advisors Group, Inc. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 - MATERIAL CHANGES

This is the initial disclosure brochure. Therefore, there are no material changes to disclose.

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

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Item 4 - ADVISORY BUSINESS

Askar Advisors Group, Inc. (hereinafter referred to as “Askar Advisors”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

Askar Advisors consists of many independent Advisory Representatives who maintain their own offices. Clients may be solicited by the Advisory Representative or referred to the Advisory Representative and engage the Advisory Representative for services. No clients are assigned by Askar Advisors. However, a client contacting the main office of Askar Advisors to inquire of the services may be provided names of Advisory Representatives within a geographic area of the client. However, clients will choose whether or not to engage the Advisory Representative for services.

Advisory Representatives are generally independent contractors. The experience, level of education, level and/or sophistication of services and fees will vary. However, the fees clients will pay for advisory services described below will not exceed the fee schedules set forth below. Further, clients are advised that they may pay more or less for similar services received by another client serviced by another Advisory Representative. Therefore, the fee a client pays is not relative to the experience and education of the Advisory Representative.

- A. Askar Advisors was established in October 2005. Askar Advisors is owned directly by Askar Holding Company. The principal owner of Askar Holding Company (i.e. owns 25% or more) is Ommund D. Skaar. All other owners own less than 25%.
- B. Askar Advisors offers the following advisory services. Each of the services is more fully described below.
 - Asset Management Programs
 - Analysis, Recommendation and Monitoring of Third Party Managed Programs
 - Financial Planning and Consulting Services
- C. Askar Advisors tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. Askar Advisors will ask you to complete an account application and a client profile to assist Askar Advisors with obtaining information about your financial situation and history. Additionally, your Advisory Representative will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information gathered by Askar Advisors will assist Askar Advisors to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, Askar Advisors will gather various financial information and history from you including, but not limited to:
 - Retirement and financial goals
 - Investment objectives
 - Investment horizon
 - Financial needs
 - Cash flow analysis
 - Cost of living needs

Askar Advisors Group, Inc.

- Education needs
- Savings tendencies
- Other applicable financial information required by Askar Advisors in order to provide the investment advisory services requested.

D. Askar Advisors does not participate in any wrap fee programs where Askar Advisors acts as the portfolio manager. However, Askar Advisors offers wrap programs through third party investment advisers. Askar Advisors will assist the client to select a management platform and select the managers.

Wrap fee program(s) may be more costly to client than if client obtained execution and investment advisory services separately. Additionally, a wrap fee account, as compared to a traditional commission based account, may be more costly to client, particularly during periods when trading activity is lower. Client may find that the account results in a higher annual cost for transactions. During periods when trading activity is heavier, such as when account is first opened, wrap fee accounts may result in lower overall costs to client.

E. As of December 31, 2010, we have approximately \$2 million of client assets under our non-discretionary management. Askar Advisors has no assets under its discretionary management.

Asset Management Programs

Askar Advisors offers several portfolio management platforms through Wells Fargo & Company (“Wells Fargo”). Wells Fargo & Company provides securities brokerages services through registered broker-dealer First Clearing, Corp. (“First Clearing”) and its wholly owned subsidiary, First Clearing, LLC.

Each of Wells Fargo’s Mutual Fund Programs is considered a “wrap fee” program. The programs, more fully described below, provide clients access to:

Abbreviations:

WFA = Wells Fargo Advisors

Bps = Basis Points

ETFs = Exchange Traded Funds

SMAs = Separately Managed Accounts

	Mutual Fund Advisory	Non Discretionary Asset Management		UMA	Separately Managed Accounts
	<i>FundSource® Program</i>	<i>CustomChoice Program</i>	<i>Asset Advisor Program</i>	<i>Diversified Managed Allocations (DMA) Program</i>	<i>Masters Program</i>
Description	Discretionary, mutual fund wrap program, based on WFA’s Manager Strategy Group –	Non-discretionary, client directed mutual fund wrap program	Non-discretionary investment advisory	Multi manager, separately managed account, based on Manager Strategy Group –	Separately managed account wrap program

Askar Advisors Group, Inc.

	driven Optimal Blends or Customized Blends			driven Optimal Blends or Customized Blends	
Discretion	WFA's Manager Strategy Group	Client	Client	WFA & Third Party Managers	Third Party Manager
Manager Fee	See Program Description	See Program Description	See Program Description	Equity – 55bps Balance – 50 bps Fixed Income – 40 bps Completion Sleeves 25 bps Mutual Funds/ETFs – 5 bps	Equity - 50 bps Fixed Income - 30 bps There may be managers with higher fees
Minimum Account Size	\$25,000	\$25,000	\$50,000	\$150,000 – Customized \$250,000 – Optimal Blends	\$100,000 generally – some managers may have higher minimums
Allowable Assets	Mutual Funds	Mutual Funds	Not limited	Manager discretion and not limited	Manager discretion
Options	31 Optimal Blends or 200 Recommended mutual funds	4,000 no-load, load waived fee based and Institutional share class mutual funds	4,000 no-load, load waived fee based and Institutional share class mutual funds	21 Optimal Blends, 120 SMAs, 200 recommended funds and 44 allowable ETFs	85 Managers, 183 Investment Styles

Clients are advised that transactions in the account, account reallocations and rebalancing may trigger a taxable event for the client, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts. Askar Advisors does not vote proxies on behalf of clients. Clients are responsible for voting all proxies.

Clients may deposit assets on which a commission was previously paid, including mutual funds on which a sales charge was paid, to a fee based account. Clients are advised that if such transactions were made through Askar Corp. or your Advisory Representative, commissions may have been previously received and Askar Corp. and your Advisory Representative will receive an advisory fee based on the fee schedule disclosed below.

Clients must promptly notify their Advisory Representative of any changes in the client's financial situation or if the client's risk tolerance, investment objectives or any other changes occur that could impact the management of their account.

MUTUAL FUND ADVISORY

FundSource®

Askar Advisors alone, or in collaboration with Wells Fargo, will recommend either an Optimal Blend or another target allocation of recommended funds, Customized Blend, which is appropriate for the client. Based on the recommendations, client selects either the Optimal Blend or the mutual funds for the Customized Blend asset allocation.

Optimal Blend

Wells Fargo has created a number of Optimal Blends, which represent certain mutual funds and target allocations recommended by Wells Fargo for a number of investment strategies based on client's investment objective and risk tolerance. Client and Advisory Representative select one of the possible program investment objectives, and with the Optimal Blend, client delegates all fund selection and investment trading discretion to Wells Fargo.

Customized Blend

Advisory Representative and the client construct a portfolio by selecting funds from Wells Fargo's Recommended and Allowable Lists of funds. Askar Advisors will provide ongoing continuous and ongoing management of the client's account based on the individual needs of the client. Askar Advisors will make changes to client's account only after consulting with client.

For both Optimal and Custom Blends, Wells Fargo will periodically remove and replace a mutual fund with another fund with a similar management style, and amend the mutual funds client selected without client's consent. These replacements may cause client to incur tax consequences; as such, client should seek the advice and counsel of a qualified tax professional relating to the prudence of investing nonqualified assets in this program.

For a full description of each investment objective, and a narrative of the vetting process Wells Fargo uses to determine which funds it will include on its Recommended Fund Roster and/or Allowable Funds List, client should review the FundSource® Program Brochure.

NON-DISCRETIONARY ASSET MANAGEMENT

CustomChoice

The CustomChoice Consulting Program ("CustomChoice") is a non-discretionary investment advisory service designed to allow the Advisory Representative to provide recommendations that will assist the client allocating assets among open-end mutual funds aligned with client's investment goals and objectives.

Askar Advisors alone, or in collaboration with Wells Fargo will recommend an appropriate mix of various open-end mutual funds and money market funds which may include funds from both the Recommended and Allowable Funds List. Client is free to accept, amend or reject any and all recommendations.

Client may choose to have assets automatically rebalanced in client's account in conformance with client's stated allocation. Client may select a quarterly, semi-annual or annual rebalance option.

Client should review the CustomChoice Program Brochure, Account Agreement, and Disclosure Document for a more comprehensive description of this program.

Asset Advisor

Eligible and Excluded Assets

"Eligible Assets" means:

- Equity Securities - common stock, options and exchange traded funds;
- Mutual Funds - mutual funds (including money market funds that are not used for cash sweep) included on Introducing Firm's allowable list ("Allowable List") meaning that the mutual funds are either: (i) no-load, no transaction fee funds offered at net asset value; or (ii) mutual funds that are typically subject to sales loads or transaction fees, but on which the sales load or transaction fee has been waived ("Eligible Funds"). Please contact your Financial Advisor to determine whether particular funds are included on the Allowable List before placing an order to buy or sell a mutual fund;
- Fixed Income Securities – corporate, municipal and government bonds and preferred stock;
- Cash – money market funds and interest bearing bank demand deposit accounts used for cash sweep (collectively, "Cash Sweep Option"), free credit balances and cash balances in the Program Account.

Eligible Assets also include closed-end funds and unit investment trusts ("UITs"). The asset class each UIT is assigned to will be based on its underlying investments. Securities and other property that do not come within the meaning of Eligible Assets are "Excluded Assets." Excluded Assets include commodity futures contracts, options on such contracts, managed futures, annuities, interests or units in limited partnerships and hedge funds, and mutual funds that are not included on Askar Advisors' Allowable List. Client may affect purchases or sales of Excluded Assets in the Program Account. However, client will incur commissions, transaction fees and other charges on these transactions.

In its sole discretion, Askar Advisors may limit or disallow new investments in certain securities or other property (or certain types of securities or other property) in the Program Account or change the types of securities or other property that qualify as Eligible Assets and Excluded Assets or are associated with each asset class from time to time without prior notice. Askar Advisors also may change the Eligible Funds included on the Allowable List from time to time without prior notice. Please contact your Advisory Representative for more information before placing an order to buy or sell securities and other property.

The Asset Advisor Program is not intended to accommodate frequent trading. Askar Advisors may in its sole discretion limit the amount of trading a client effects in client's Account, or close an Account that engages in what Askar Advisors deems to be excessive trading.

Askar Advisors offers periodic rebalancing of mutual funds in the client's account, at the client's request. Rebalancing is available at predetermined intervals (e.g., annually) or upon the client's direction.

UMA

Diversified Managed Allocations

The Diversified Managed Allocations Program (“DMA”) offers a variety of “separate account managers,” representing a broad array of investment classes and styles. Wells Fargo formulates this roster of investment advisers by evaluating a broad range of asset classes and investment styles that perform differently under varying market conditions and that are complementary to one another. From these various classes and styles, it uses quantitative and qualitative measures to identify several investment advisers in each of these various classes and styles. Wells Fargo reviews candidates for the DMA investment advisers roster based on a number of criteria, including advisers’ past record, management style, number and continuity of investment professionals, and client servicing capabilities.

From this roster of investment advisers, Wells Fargo created a number of *Optimal Blends*, which represent certain investment advisers and target allocations Wells Fargo recommends for a number of investment strategies based on client’s investment objectives and amount of investment.

Consistent with client’s goals, objectives and risk tolerance, Wells Fargo will recommend either an *Optimal Blend*, or another target allocation of investment advisers, known as a *Customized Blend*, that is appropriate for client. From this, client will select a target allocation of two or more investment advisers to handle the day-to-day management of client’s account.

Client should review the Separately Managed Account Programs Disclosure Document for definitions of specific investment objectives as well as complete program information including fees and operations.

SEPARATELY MANAGED ACCOUNTS

Masters

This program provides clients access to a number of third party managers. The third party managers will determine the securities to be purchased and sold within the account and be engaged to manage the account. Askar Advisors will have no trading authority on the account. Clients will grant discretionary authority to the third party manager(s).

Askar Advisors will monitor the client’s account and periodically meet with the client to review the account. Should Askar Advisors determine a manager should be replaced; Askar Advisors will discuss the recommendation with the client and obtain the client’s authorization prior to hiring or firing a third party manager. Each manager may place minimum account requirements.

Client should review the Separately Managed Account Programs Disclosure Document for definitions of specific investment objectives as well as complete program information including fees and operations.

Analysis, Recommendation and Monitoring of Third Party Managed Programs

Askar Advisors has entered into relationships with various third party managers to offer clients another alternative to asset management services. A client's Advisory Representative may recommend client consider engaging one or more third party managers to manage the client's account. Additionally, Advisory Representatives may utilize third party managers to add a different level of management diversification to the client's portfolio. Third party managers offer different management programs and may specialize in a particular kind of management such as fixed income, tactical, static management, sector management, utilize strategies involving hedge funds, options, timing services, etc.

Askar Advisors will exclude those assets it refers to another investment adviser from any fee Askar Advisors charges to client; however, the particular independent registered investment adviser will pay a referral fee to Askar Advisors for client referrals (see below).

Askar Advisors has relationships with the following third party managers. Askar Advisors may add or delete managers from the list as deemed appropriate by Askar Advisors.

- Dean
- BTS
- Schofield
- RNC Genter
- Madison Investment Advisors

Askar Advisors acts as the communication conduit between the client and the third party manager. The client's Advisory Representative will evaluate the client's financial situation, risk tolerance, financial goals and objectives and recommend one or more third party managers and a management program option. Thereafter, the client's Advisory Representative will periodically meet with the client to evaluate the overall performance and management of the clients account and reassess the appropriateness of the management program for the client.

Factors Askar Advisors considers in making a recommendation includes client's account size, risk tolerance, and client's thoughts and opinions, as well as the independent adviser's investment philosophy. Client should refer to the independent adviser's disclosure document for a full description of the services it offers.

If Askar Advisors believes that a particular independent adviser is performing inadequately or if Askar Advisors believes that a different manager may be more suitable for client's particular needs, Askar Advisors may suggest a client contract with a different third party manager. Any move to a new third party manager is solely at client's discretion. Neither Askar Advisors nor the client's Advisory Representative will have the authority to hire and/or fire a third party manager without the client's prior consent.

Askar Advisors may perform management searches for various independent registered investment advisers to manage some or all of client's assets. Under this scenario, Askar Advisors will exclude those assets it refers to another investment adviser or third party manager from any fee Askar Advisors charges to client. However, the particular third party manager will pay a referral fee to Askar Advisors for client referrals (see below). Such referral fee is typically a portion of the advisory fee charged and collected by the third party manager. Therefore, Askar Advisors has an interest in the advisory fee charged to the client.

Askar Advisors will not directly conduct any securities transactions on behalf of the client or participate directly in the selection of the securities to be purchased or sold for the client. Investment decisions are made by the third party manager in accordance with the agreement between client and manager.

Financial Planning and Consulting Services

Askar Advisors offers various financial planning services and asset allocation services customized to the client's need. Areas of analysis may include but not be limited to:

- Asset Allocation and Portfolio Diversification
- Risk Tolerance Analysis
- Qualified Plan Options and/or Retirement Planning Analysis
- Death and Disability Analysis and Planning
- Estate Tax Analysis
- Explanation of Estate Planning Strategies
- Business Succession Analysis and Planning
- Tax and Cash Flow Analysis
- Employee Stock Option Planning and Group Benefits
- Analysis of Debt or Major Purchases
- Investment Impact on Alternative Minimum Tax
- Document Preparation, e.g. realized gain/loss reports, etc.
- Education Planning/College Cost Projections
- Other specific client requests
- Budget Analysis

Askar Advisors will gather financial information and history from clients including, but not limited to, retirement and financial goals, investment objectives, investment horizon, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, and other applicable financial information required by Askar Advisors in order to provide the investment advisory services requested. Based upon client's needs, Askar Advisors will present to the client an analysis of the client's situation and recommendations for steps to be taken to assist the client to work toward the determined financial goals.

Financial plans are based on the client's financial situation at the time and are based on the financial information disclosed by the client to Askar Advisors. Clients are advised that certain assumptions

may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Askar Advisors cannot offer any guarantees or promises that client's financial goals and objectives will be met. Further, client must continue to review any plan and update the plan based upon changes in the client's financial situation, goals, or objectives or changes in the economy. Should client's financial situation or investment goals or objectives change, clients must notify Askar Advisors promptly of the changes. Clients are advised that the advice offered by Askar Advisors may be limited and is not meant to be comprehensive. Therefore, a client may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

General Information

You are advised the investment recommendations and advice offered by Askar Advisors are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform Askar Advisors promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify Askar Advisors of any such changes could result in investment recommendations not meeting your needs.

Item 5 - FEES AND COMPENSATION

Askar Advisors' Advisory Representatives are independent contractors. As such, Advisory Representatives have an interest in the advisory fee charged to the client since Askar Advisors will pay a portion of the advisory fee to the Advisory Representative. The amount of the fee paid to the Advisory Representative may be adjusted depending on the amount of the Representative's overall production. Furthermore, clients are advised that different Advisory Representatives may charge varying fees, provided the fees do not exceed Askar Advisors' fee schedules. Consequently, clients receiving similar services may pay more or less than another client who is serviced by another Advisory Representative. The amount of fee charged by Advisory Representatives is subject to negotiation between the client and the Advisory Representative. Further, clients are advised there is not necessarily correlation between the amount of the advisory fee charged to a client and the Advisory Representative's education, experience, and/or qualifications.

Advisory Representatives who are Registered Representatives may receive trail commissions (i.e. 12b-1 fees) for a period of time. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees may be initially paid to Askar Corp. and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As stated above, each of Wells Fargo's Mutual Fund Programs is considered a "wrap fee" program. Therefore, clients pay one, all-inclusive fee, payable quarterly, (in advance) for advisory, execution, consulting and custodian services. This fee includes Askar Advisors' fee, but does not include any mutual fund expenses as they relate to client's positions. Client should review fund's prospectus for specifics on mutual funds costs and expenses.

Asset Advisor, FundSource® Program, CustomChoice

<u>Total Account Value</u>	<u>Default Annual Fee</u>
First \$250,000	3.0%
Next \$750,000	2.5%
Over \$1 million	2.0%

The fees specified in this Section will apply to Eligible Assets. An adjusted or alternate fee can be negotiated and indicated in writing on the Asset Advisor client Agreement.

Asset Advisor – Additional Information

Changes in the definitions of Eligible Assets and Excluded Assets may affect the Asset-Based Fee rate client is charged and Askar Advisors will provide client with prior notice of any increase in the Asset-Based Fee rate caused by changes in the definitions of Eligible Assets and Excluded Assets.

Analysis, Recommendation and Monitoring of Third Party Managed Programs

Askar Advisors will only recommend advisers that pay Askar Advisors a referral fee. For client assets on which Askar Advisors earns a solicitor's fee, Askar Advisors will not charge a separate fee in addition to the solicitor's fee it earns on those assets.

Various third party managers charged different fees and some manager's fees may be higher or lower than another manager's fee. Additionally, there may be a conflict of interest for Advisory Representatives to recommend third party managers to share a larger portion of their fee over other equally as suitable or more suitable managers. Further, clients are advised the fee paid by the client referred to a third party manager maybe higher as a result of referral fee being paid to Askar Advisors. Third party managers have minimum account size requirements that will vary.

Financial Planning and Consulting Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with Askar Advisors, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

The Advisory Representative will propose a fee to client, taking into consideration several factors including, but not limited to client requested services, time to analyze client's situation and prepare client's plan, number of client meetings, research, and involvement of or consultation with other professionals. Fees may vary by Advisory Representative depending on Advisory Representative's experience and qualifications.

Hourly Fees: Generally, fees will range from \$75 to \$250 per hour. Fees are negotiable. Askar Advisors generally requires client to pay a negotiable percentage of the overall quoted and estimated fee up front, as a retainer, for Advisory Representative to commence preparation of plan. Remainder or total fee is due upon completion and presentation of the plan or analysis. Total fee is due, payable and nonrefundable at the time Advisory Representative delivers, and client receives completed plan.

One-time fee or Annual fee: client may also engage Askar Advisors to perform services for a fixed fee. Fixed fees generally apply in lieu of hourly fees; Askar Advisors' fixed fee will not exceed \$10,000 per case, per annum.

Client and Advisory Representative will execute a Financial Planning Agreement or Engagement Letter to specify fee for agreed upon work. Client may terminate financial planning engagement, without penalty, by providing Askar Advisors with written notice of termination within five (5) calendar days of executing Investment Advisory/Financial Planning Agreement or Engagement Letter. Otherwise, either party may terminate this engagement, without penalty, by providing the other party with a written, five-day notice. After five days after executing Financial Planning Agreement or Engagement Letter, any up-front retainer fee becomes non-refundable.

Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

This section is not applicable to Askar Advisors since Askar Advisors does not charge performance based fees.

Item 7 - TYPES OF CLIENTS

Askar Advisors' services are geared toward individuals both high net worth (i.e. Clients with a net worth of \$1,500,000) and other than high net worth.

As stated above under Item 4, the managed programs have the following minimum account size requirements.

	Mutual Fund Advisory	Non Discretionary Asset Management		UMA	Separately Managed Accounts
	<i>FundSource® Program</i>	<i>CustomChoice Program</i>	<i>Asset Advisor Program</i>	<i>Diversified Managed Allocations (DMA) Program</i>	<i>Masters Program</i>
Minimum Account Size	\$25,000	\$25,000	\$50,000	\$150,000 – Customized \$250,000 – Optimal Blends	\$100,000 generally – some managers may have higher minimums

Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

- A. Askar Advisors conducts fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.
- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by Askar Advisors will require you to be prepared to bear the risk of loss and fluctuating performance.

Askar Advisors does not represent, warrant or imply that the services or methods of analysis used by Askar Advisors can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Askar Advisors will provide a better return than other investment strategies.

- C. Askar Advisors primarily uses mutual funds. Further, management is offered through third party managers. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and fund straying from its objective. Open ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time Askar Advisors will direct the client to the appropriate Web page to access the prospectus.

Item 9 - DISCIPLINARY INFORMATION

There is no reportable disciplinary information required for Askar Advisors or its management persons that is material to your evaluation of Askar Advisors, its business or its management persons.

Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. Advisory Representatives are dually registered as an advisory representative of Askar Advisors and as a registered representative of Askar Corp. a registered broker/dealer. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at Askar Corp. than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through Askar Corp. in that the higher

their production with Askar Corp. the greater potential for obtaining a higher pay-out on commissions earned.

- B, C. Management persons of Askar Advisors are officers, directors and management persons of Askar Corp, a registered broker/dealer, member FINRA and SIPC. Askar Advisors and Askar Corp. are sister companies and under the same control and management.

Askar Advisors is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, Askar Advisors is not and does not have a related person who is: investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

Askar Advisors attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as a registered representative with Askar Corp., Advisory Representatives are subject to a supervisory structure at Askar Corp. for his securities business.

- D. As stated under Item 4, *Advisory Business* above, Askar Advisors recommends other investment advisers (i.e. third party managers) and will receive a portion of the fee charged to you by the investment adviser. Since Askar Advisors has an interest in the compensation this is considered a material conflict of interest. Askar Advisors selects third party managers based on several criteria including cost, type of management, past history, ability to meet a need and provide a unique service. Since the fee charged to you is based on the value of your portfolio, all parties have an incentive to work toward performance goals and objectives. Consequently, if the third party manager does not adequately manage your account and the value of your portfolio goes down, so does the third party manager's and Askar Advisors' compensation.

Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code Of Ethics

- A. Askar Advisors has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Askar Advisors takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as Askar Advisors' policies and procedures. Further, Askar Advisors strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with Askar Advisors' Privacy Policy. As such, Askar Advisors maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-

approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, Askar Advisors' Code of Ethics establishes Askar Advisors' expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

- B. Neither Askar Advisors nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. Askar Advisors and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, Askar Advisors and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. Askar Advisors and its associated persons will not put their interests before your interest. Askar Advisors and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. Askar Advisors is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

Prohibition on Use of Insider Information

Askar Advisors has adopted policies and procedures to prevent the misuse of "insider" information (i.e. material non-public information). A copy of such policies and procedures is available to any person upon request.

Item 12 - BROKERAGE PRACTICES

As previously stated, Advisory Representatives are registered representatives of Askar Corp. Further, as previously stated, Askar Corp. and Askar Advisors are sister companies and under similar ownership, control and management. Therefore, if you elect to implement through your Advisory Representative, implementation of securities transactions must be through Askar Corp. and entities with which Askar Corp. has arrangements.

Advisory Representatives are subject to FINRA Conduct Rule 3040 which may restrict such them from conducting securities transactions away from Askar Corp. unless Askar Corp. provides him with written authorization.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by Askar Advisors will be limited to only advice and will not include implementation. If you who select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from Askar Advisors.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

You are advised there is an incentive for Askar Advisors and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

Askar Corp. has a wide range of approved securities products for which Askar Corp. performs due diligence prior to selection. Askar Corp.'s registered representatives are required to adhere to these products when implementing securities transactions through Askar Corp.. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Askar Corp. also provides Advisory Representatives, and therefore the Askar Advisors, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and Askar Advisors manage and further develop its business enterprise.

Askar Corp. and its clearing broker/dealer, First Clearing, LLC also make available to Askar Advisors other products and services that benefit Askar Advisors but may not directly benefit you. Some of these other products and services assist Askar Advisors with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of Askar Advisors' fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Askar Advisors' accounts, including accounts not held through Askar Corp..

Due to the individual management of client accounts, Askar Advisors does not aggregate the purchase or sale of securities for various client accounts.

Item 13 - REVIEW OF ACCOUNTS

- A. If you are participating in the Asset Management Programs you will have reviews not less than at least annually or as agreed by you and your Advisory Representative. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management of your assets are invested, and market shifts and corrections.

If you are participating in Financial, Retirement and College Planning Services you will not receive regular reviews. Askar Advisors recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

- B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.
- C. You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. Upon request, your Advisory Representative will provide you with a consolidated report of your managed account. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

- A. Product vendors recommended by Askar Advisors may provide monetary and non-monetary assistance with client events, provide educational tools and resources. Askar Advisors does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. Askar Advisors' due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and Askar Advisors.
- B. Askar Advisors does not directly or indirectly compensate any person who is not a supervised person of Askar Advisors for referrals. Further, Askar Advisors does not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

Item 15 - CUSTODY

With the exception of deduction of Askar Advisors' advisory fees from your accounts, Askar Advisors does not take custody of your funds or securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

Item 16 - INVESTMENT DISCRETION

Askar Advisors does not take discretionary authority to execute securities transactions in your account or hire and fire third party advisers without prior consultation with you.

Item 17 - VOTING CLIENT SECURITIES

Askar Advisors does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact Askar Advisors about questions you may have or opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 - FINANCIAL INFORMATION

- A. Askar Advisors will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.
- B. Askar Advisors does not accept discretionary authority over your funds or assets and does not take custody directly or indirectly over your funds or securities.
- C. Askar Advisors has not been the subject of a bankruptcy petition.

Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS

This section is not applicable to Askar Advisors. Askar Advisors is not state registered. Askar Advisors is registered with the Securities and Exchange Commission.