

## **Firm Brochure**

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of T.T.G. Financial, Inc. If you have any questions about the contents of this brochure, please contact us at: 330-491-2220, or by email at: [jimevans@teamttg.com](mailto:jimevans@teamttg.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 T.T.G. Financial, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

12/31/2010

## Material Changes

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### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 330-491-2220 or by email at: [jimevans@teamttg.com](mailto:jimevans@teamttg.com).

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# Advisory Business

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## Firm Description

T.T.G. Financial, Inc., (“TTG”) was founded in 2006.

TTG provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

TTG is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

Investment advice is an integral part of financial planning. In addition, TTG advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

TTG does not act as a custodian of client assets. The client always maintains asset control. TTG places trades for clients under a limited power of attorney.

Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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## Principal Owners

James Kotagides is a 50% stockholder. James L. Evans is a 50% stockholder.

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### **Types of Advisory Services**

TTG provides investment supervisory services, also known as asset management services; furnishes investment advice through consultations.

On more than an occasional basis, TTG furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/2010, TTG manages approximately \$ 37 million in assets for approximately 60 clients. Approximately \$37 million is managed on a discretionary basis, and \$0 is managed on a non-discretionary basis.

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### **Tailored Relationships**

Assets are managed based on one of five risk groups detailed in our Investment policy statement. Clients are interviewed and complete the TTG Rick Quiz to determine the risk group appropriate to them.

Agreements may not be assigned without client consent.

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### **Types of Agreements**

The following agreements define the typical client relationships.

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### **Hourly Planning Engagements**

TTG provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.

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### **Asset Management**

Stocks and bonds are purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. TTG does not receive any compensation, in any form, from brokerage or fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

The annual Asset Management Agreement fee is based on a percentage of the investable assets according to the following schedule:

- \_1.00%\_ on assets with a value of less than \$250,000;
- \_0.90%\_ on assets with value of less than \$500,000;
- \_0.75%\_ on the assets from \$500,001 to \$1,000,000;
- \_0.60%\_ on assets from \$1,000,001 to \$2,500,000;
- \_0.45%\_ on assets from \$2,500,001 to \$5,000,000.

Current client relationships may exist where the fees are higher or lower than the fee schedule above.

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**Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying TTG in writing. If the client made an advance payment, TTG will refund any unearned portion of the advance payment. TTG does not typically charge fees in advance.

TTG may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, TTG will refund any unearned portion of the advance payment. TTG does not typically charge fees in advance.

## Fees and Compensation

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### Description

TTG bases its fees on a percentage of assets under management, hourly charges and fixed fees.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are not negotiable.

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### Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Hourly fees are billed in arrears. Occasionally at our discretion we may require a retainer before beginning work on a case or project.

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### Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

TTG, in its sole discretion, may occasionally provide advice on a pro bono or discounted basis.

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### Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to TTG.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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### Past Due Accounts and Termination of Agreement

TTG reserves the right to stop work on any account that is more than 30 days overdue. In addition, TTG reserves the right to terminate any financial

planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in TTG's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded as soon as practicable. TTG does not typically charge fees in advance.

## Types of Clients

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### Description

TTG generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations and corporations or business entities.

Client relationships vary in scope and length of service.

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### Account Minimums

The minimum account size is \$500,000 of assets under management, which equates to an annual fee of \$3750.

TTG has the discretion to waive the account minimum. Accounts of less than \$500,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$500,000 within a reasonable time. TTG may make other exceptions at its sole discretion.

TTG does not have a minimum fee.

# Methods of Analysis, Investment Strategies and Risk of Loss

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## Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by ourselves and others, corporate rating services, timing techniques, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

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## Investment Strategies

Our investment strategy is detailed in our Investment Policy Statement. The IPS is provided to each new client and is offered to existing clients quarterly.

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## Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
  - **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
  - **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
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## Disciplinary Information

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### Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## Other Financial Industry Activities and Affiliations

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### Financial Industry Activities

TTG is registered as a commodity trading advisor.

### Affiliations

TTG is an independent Registered Investment Advisor.

## Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

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### Code of Ethics

Each employee signs off on the following Code of Ethics:

- 1) As an employee of TTG Financial, Inc. you pledge at all times to put the clients interests ahead of your own interests or the interests of the firm.
- 2) You pledge to treat clients in the same manner that you wish to be treated.

### Participation or Interest in Client Transactions

TTG and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the TTG *Compliance Manual*.

### Personal Trading

The Chief Compliance Officer of TTG is Jim Evans. He reviews all employee trades periodically. His trades are reviewed by Jim Kotagides. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small, the trades do not affect the securities markets.

# Brokerage Practices

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## **Selecting Brokerage Firms**

TTG does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. TTG recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

TTG recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab & Co.

TTG does not receive fees or commissions from any of these arrangements.

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## **Best Execution**

TTG reviews the execution of trades at each custodian periodically. Trading fees charged by the custodians are reviewed on a periodic basis. TTG does not receive any portion of the trading fees.

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## **Soft Dollars**

TTG does not receive soft dollar benefits. Various firms whom we use for trade executions may from time to time provide us with research, however, we believe the research we receive is generally available to the public and does not present an actual valuable consideration.

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## **Order Aggregation**

Bond and equity trades are often aggregated and then allocated to individual client accounts. Particularly for fixed income transactions, aggregation often helps us find better execution.

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## Review of Accounts

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### Periodic Reviews

Account reviews are performed quarterly by advisors Jim Kotagides, President and Jim Evans, Vice president. Account reviews are performed more frequently when market conditions dictate.

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### Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

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### Regular Reports

Investment Management Clients receive periodic communications on at least a quarterly basis. The written updates may include a portfolio statement with a performance update and market commentary.

## Client Referrals and Other Compensation

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### Incoming Referrals

TTG does not compensate referring parties for referrals.

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### Referrals Out

TTG does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Custody

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### Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

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### Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by TTG.

## Investment Discretion

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### Discretionary Authority for Trading

TTG accepts discretionary authority to manage securities accounts on behalf of clients. TTG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, TTG consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given. TTG does not typically accept non-discretionary accounts.

The client approves the custodian to be used and the commission rates paid to the custodian. TTG does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

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### Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades and manage your account per our agreement with you.

## Voting Client Securities

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### Proxy Votes

TTG would vote all shares as directed by the Boards of Directors. If there were disagreement with the recommendations of the Boards, or the direction the company were taking, TTG would sell off the position in all portfolios.

## Financial Information

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### Financial Condition

TTG does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because TTG does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

# Business Continuity Plan

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## General

TTG has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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## Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

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## Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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## Loss of Key Personnel

Jim Kotagides and Jim Evans have an agreement to continue servicing all clients if one or the other should become unable to provide said service.

# Information Security Program

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## Information Security

TTG maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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## Privacy Notice

TTG is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these

nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

## Brochure Supplement (Part 2B of Form ADV)

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### Education and Business Standards

TTG requires that its advisors have or are working toward a professional designation, i.e. RFC, CFP, ChFC. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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### Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree or equivalent work experience.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Registered Financial Consultant (RFC): Registered Financial Consultants are licensed by The International Association of Registered Financial Consultants to use the RFC mark. RFC certification requirements:

- Hold a Master's degree from an accredited institution or have earned certain professional designations, i.e. CFP.
- Fulfill association requirements, which includes continuing education and practice standards.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by IARFC..

Qualified Pension Administrator & Qualified 401(k) Administrator (QPA, QKA):

QPAs and QKAs are licensed by the American Society of Pension Professionals and Actuaries to use the QPA and QKA mark. QPA and QKA certification requirements:

- Completion of the financial planning education requirements set by the ASPPA.
- Successful completion of a series of exams.

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**James Kotagides**

James Kotagides has been in the financial services business for 14 years. From June 1996 to December 2003 he traded his own capital using various methods of technical analysis. He joined The Guardian/Park Avenue Securities as an agent/stock broker in December 2003. His duties included sales, asset allocation and client management. In October 2006 he co-founded TTG Financial. He has served as a principal for TTG Financial from October 2006 to the present. His broad responsibilities include equity and bond research and trading of the same. He also tracks a variety of technical indicators and executes entry and exit points for all TTG holdings. He obtained his Stock Brokers license (Series 7) in March 2004 and his Commodities Trading license in May 2008 (Series 3) at which point he also became a member of the National Futures Association. He obtained his bachelor's degree in economics from Ohio State University in 1974 and his MBA from the University of Michigan in 1976. He has obtained the Professional Designation; Registered Financial Consultant in June 2007.

Other Business Activities: None

**Supervision:**

James Kotagides is supervised by James Evans, Vice President. He reviews Jim's work through frequent office interactions as well as remote interactions.

**SUPERVISOR'S contact information:**

330-491-2220 jimevans@teammgtg.com

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**James L. Evans**

James L. Evans has been in the financial services business for 22 years. He began his career with Northwestern Mutual/Robert W. Baird in 1986 where he served as life agent and stock broker. From December 1989 to September 2006 he was a stock broker and branch manager for Park Avenue Securities in Canton, Ohio. His responsibilities included compliance, asset allocation strategy, marketing and accounting. Simultaneously from December 1989 to September 2004 he founded and was president of Western Reserve Pension Services, Inc. His duties included managing pension assets, discrimination testing, feasibility studies and general operations. He sold Western Reserve in September 2004, but continued his duties for Park Avenue Securities. In October 2006, he co-founded TTG Financial. He has served as a principal for TTG Financial from October 2006 to the present. His broad responsibilities including compliance, accounting, trading and asset allocation modeling. He obtained his Stock Brokers license (Series 7) in January 1988, his General Principals license (Series 24) in July 1999 and his Commodities Trading license in May 2008 (Series 3) at which point he also became a member of the National Futures Association. He has three Professional Designations; Qualified Pension Administrator in May 1994 and Qualified 401(k) Administrator in December 2002 issued by the American Society of Pension Professionals and Actuaries and the Certified Financial Planner designation issued by the Board of Certified Financial Planners in October 2005.

**Other Business Activities:**

Jim provides management services for Sirak Financial Companies and receives compensation for said services.

**Supervision:**

Jim is supervised by James Kotagides, President. He reviews Jim's work through frequent office interactions as well as remote interactions.

**SUPERVISOR'S contact information:**

330-491-2220 jimkotagides@teamttg.com