

Ministry Benefit Investments, LLC

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Form ADV Part 2A Brochure

Ministry Benefit Investments, LLC is an investment adviser registered with the Securities and Exchange Commission ("SEC"). An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Ministry Benefit Investments, LLC. If you have any questions about the contents of this brochure, please contact us at (469) 778-3033. 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 Ministry Benefit Investments, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD/IARD number is 281619.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this brochure.

This is our firm's first brochure and therefore we have not made any material changes. We review and update our brochure at least annually to make sure that it remains current.

Full Brochure Available

If you would like to receive a complete copy of our Form ADV Part 2 Brochure, please contact Michael Wallin, Chief Compliance Officer, at (469) 778-3033 or by email at mwallin@ministrybenefit.com.

Table of Contents - Item 3

Contents

Cover Page - Item 1.....	1
Material Changes - Item 2.....	2
Table of Contents - Item 3	3
Advisory Business - Item 4	4
Fees and Compensation - Item 5	6
Performance-Based Fees and Side-By-Side Management - Item 6	7
Types of Clients - Item 7.....	7
Methods of Analysis, Investment Strategies and Risk of Loss - Item 8.....	7
Disciplinary Information - Item 9	8
Other Financial Industry Activities or Affiliations - Item 10.....	8
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11.....	10
Brokerage Practices - Item 12	10
Review of Accounts - Item 13	10
Client Referrals and Other Compensation - Item 14	11
Custody - Item 15	11
Investment Discretion - Item 16	11
Voting Client Securities - Item 17.....	11
Financial Information - Item 18	12
Requirements of State-Registered Advisers - Item 19.....	12
Miscellaneous	12

Advisory Business - Item 4

Ministry Benefit Investments, LLC (hereinafter “MBI”) is a registered investment adviser based in Coppell, TX. MBI has been offering advisory service since 2015. Allen P. Hargis, Jerry P. Whitley, Michael R. Wallin and Coppell Advisory Solutions, LLC are the principal owners of MBI.

The following paragraphs describe our services and fees. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly licensed or registered as investment adviser representatives.

Financial Planning Services

We offer broad based financial planning services, including tax planning, investment planning, insurance planning, estate planning, disability planning, business planning, retirement planning, education planning, and budgeting and cash flow analysis. MBI strives to achieve a client’s long-term financial goals by implementing a financial planning process that may include any or all of the following steps:

- Assessment of a client’s present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, pension plans, employee benefit statements, etc.
- Identification of a client’s financial and personal goals and objectives. Goals or objectives may include financing a child’s college education or retirement planning. The identified goals or objectives are specific, realistic and measurable. All goals include time horizons.
- Resolution of finance related problems. Obstacles to achieving financial independence are identified so that resolution may occur. Examples of problem areas can include too little or too much insurance coverage, inadequate cash flow or a high tax burden.
- Plan Design. A written financial plan, when necessary, is prepared that includes recommendations and solutions to any financial related problems.
- Implementation of the financial plan. The financial plan is finalized and agreed upon. The recommendations and solutions are executed to reach the desired goals and objectives.
- Evaluation of the financial plan is reviewed periodically. The financial planning service provides the option of conducting a periodic review and revision of the plan to ensure that the financial goals are achieved. The client may be required to pay an additional fee to exercise this option.

We also provide financial planning services that cover a specific area, such as retirement or estate planning. We offer consultative services where we set an appointment to meet with you for financial planning advice for an hourly or a flat fee.

Financial plans are based on your financial situation and the financial information you provide to our firm. If your financial situation, goals, objectives, or needs change, you must notify us promptly. You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our investment advisory services or by using the advisory/brokerage firm of your choice.

Note: Information related to tax and legal consequences that is provided as part of the financial plan is

for informative purposes only. Clients are instructed to contact their tax or legal advisers for personalized advice.

Investment Monitoring and Referral Services

Our investment advice is tailored to meet our Clients' needs and investment objectives. If you decide to hire our firm to assist you with the management of your portfolio, an Associated Person of MBI will meet with you and gather information about your financial situation, investment objectives, and any reasonable restrictions you would like to impose on the management of the account. The information we gather will help us implement an asset allocation strategy that will be specific to your needs and goals.

Currently, we offer asset allocation and advisory services through various sub advisers. All sub advisers recommended by the firm must be registered with either the Securities and Exchange Commission or with the applicable State securities division. Factors considered in the selection of sub advisers include but may not be limited to: i) MBI's preference for particular sub advisers; ii) the sub advisers' quality of service and track record; iii) the client's risk tolerance, goals and objectives, as well as investment experience; and, iv) the amount of client assets available for investment.

The sub adviser may customize your portfolio by either using proprietary models or models provided by other affiliated or unaffiliated investment advisers. The investment strategy adopted by the sub advisers may embrace value, growth or contrarian investing styles. Generally, securities transactions will be decided upon and executed by the sub advisers on a discretionary basis. This means that the manager selected will have the ability to buy and sell securities in your account without obtaining your approval.

We will continuously monitor the performance of the accounts managed by the sub advisers and will assume discretionary authority to hire or fire the sub adviser where such action is deemed to be in your best interest. We also assume discretionary authority to reallocate client assets into a different asset allocation model managed by the same sub adviser. An Associated Person of MBI will contact the client at least annually, or more often as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the sub adviser managing the account as necessary, and to assist the client in understanding and evaluating the services provided by the sub adviser. Clients will be expected to notify MBI of any changes in their financial situation, investment objectives, or account restrictions.

A complete description of the programs and services provided by the sub advisers, the amount of total fees, the payment structure, termination provisions and other aspects of each portfolio management service are detailed and disclosed in: i) the sub adviser's Form ADV Part 2A; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; or, iii) the sub adviser's account opening documents. A copy of all relevant disclosure documents of the sub adviser and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Assets Under Management

Since we are a newly registered investment adviser, as of October 2015, we do not have any reportable assets under management.

Fees and Compensation - Item 5

Financial Planning Services Fees

MBI charges fixed fees and/or hourly fees for financial planning services. We utilize the following financial planning fee schedules:

- *Fixed Fees:* We charge a fixed fee of up to \$10,000.00, for broad based planning services. For example, a client with limited assets who hires the firm for retirement planning may only pay a fee of \$1,000.00 while a client with a complex financial situation who hires the firm for a broad based plan that includes a retirement plan, insurance review, tax planning, estate planning, cash flow planning and education goal planning may pay a fee of \$10,000.00. *In limited circumstances*, the total cost could potentially exceed \$10,000.00. In these cases, we will notify the client and may request that the client pay an additional fee.
- *Hourly Fees:* MBI charges an hourly fee of up to \$200 for clients who request specific services (such as a modular plan or hourly services) and do not desire a broad based written financial plan.

Prior to engaging MBI to provide financial planning services, the client will be required to enter into a written agreement with the firm. The Agreement will set forth the terms and conditions of the engagement and describe the scope of the services to be provided and the portion of the fee that is due from the client. Generally, MBI requires a prepayment of 50% of the fee with the remaining balance due upon completion of the agreed upon services. MBI does not require the prepayment of over \$1,200, six or more months in advance. Hourly fees charged for specific services are payable as invoiced.

We may offset or waive all or a portion of our financial planning fees if the client engages MBI for additional investment advisory services.

Either party may terminate the Agreement by written notice to the other. In the event the client terminates MBI's financial planning services, the balance of MBI's unearned fees (if any) shall be refunded to the client within 15 business days.

Investment Monitoring and Referral Services Fees

MBI will share in the fee paid to the sub adviser. The management fee is disclosed in the sub adviser's disclosure documents. These fees may or may not be negotiable. MBI's compensation may differ depending upon the firm's individual agreement with each sub adviser. MBI or its Associated Persons may have an incentive to recommend one sub adviser over another sub adviser with whom it has less favorable compensation arrangements or other advisory programs offered by sub advisers with which it has no compensation arrangements. In order to address this conflict, the firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients when taking investment action and to uphold their fiduciary duty and to put the client's interest first. Clients are not required to use the services of any sub adviser we recommend.

At this time MBI has a sub advisory relationship with Coppell Advisory Solutions, LLC dba Fusion Investment Advisors ("Fusion"), an affiliated SEC registered investment adviser firm. Fusion owns 25%

of MBI. Clients should discuss any questions with or request further information from their portfolio manager concerning the use of Fusion or the conflict of interest this creates.

Performance-Based Fees and Side-By-Side Management - Item 6

We and our Associated Persons do not accept performance based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets.

Types of Clients - Item 7

We generally offer investment advisory services to individuals, pension and profit sharing plans and participants, trusts, estates, charitable organizations, corporations, and other business entities. Clients who wish to open an advisory account with a sub adviser will be subject to the minimum account requirements imposed by the sub adviser.

Methods of Analysis, Investment Strategies and Risk of Loss - Item 8

All portfolio management and financial planning services are offered by the Associated Persons and the sub advisers in accordance with investment programs developed by MBI. MBI may implement its own methods of analysis and investment strategies. Clients should refer to the disclosure documents provided by the sub adviser(s) for more information about these firm's methods of analysis and investment strategies.

Investing in securities involves risk of loss that clients should be prepared to bear. Clients should fully understand the nature of the contractual relationship(s) into which they are entering and the extent of their exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed will be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of loss. Investing may involve substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original

amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Disciplinary Information - Item 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is no history of material legal or disciplinary events by our firm or our management persons.

Other Financial Industry Activities or Affiliations - Item 10

Jerry P. Whitley, Member, is founder and an owner of Ministry Benefit Advisors, LLC, an insurance agency based in Hot Springs, AR. He is also a licensed insurance agent and may recommend insurance products offered by such carriers for whom he functions as an agent and receives a commission for doing so. Some of MBI's advisory clients may also purchase insurance products from Mr. Whitley. Please be advised that although Mr. Whitley strives to put clients' interests first and foremost, there is a potential conflict of interest in that there is an economic incentive to recommend insurance and other investment products of such carriers. Clients may utilize any insurance carrier or insurance agency they desire. However, individuals employed in the capacity of clergy services are limited in the carriers and products available to maintain their favorable tax privileges.

Michael R. Wallin, CFP®, Managing Member and Investment Adviser Representative, is the owner of Mountain Brooke Wealth Management, LLC, through which he markets investment advisory and financial planning services. Mr. Wallin is the also owner of Financial Architects & Consultants, Corp., a firm that provides financial planning design for independent financial advisors and investment advisers. Additionally, Mr. Wallin is a licensed insurance agent and may recommend insurance products offered by such carriers for whom he functions as an agent and receives a commission for doing so. Some of MBI's advisory clients may also purchase insurance products from Mr. Wallin. Please be advised there is

a potential conflict of interest in that there is an economic incentive to recommend insurance and other investment products of such carriers. Please also be advised that he strives to put clients' interests first and foremost, and clients may utilize any insurance carrier or insurance agency they desire. However, individuals employed in the capacity of clergy services are limited in the carriers and products available to maintain their favorable tax privileges.

Allen P. Hargis, Member, is a Certified Public Accountant, Investment Advisor Representative, and a licensed insurance agent. He markets investment advisory and financial planning services and may recommend insurance products offered by such carriers for whom he functions as an agent and receives a commission for doing so. Some of MBI's advisory clients may also purchase insurance products from Mr. Hargis. Please be advised there is a potential conflict of interest in that there is an economic incentive to recommend insurance and other investment products of such carriers. Please also be advised that although Mr. Hargis strives to put clients' interests first and foremost, there is a potential conflict of interest in that there is an economic incentive to recommend insurance and other investment products of such carriers. Clients may utilize any insurance carrier or insurance agency they desire. However, individuals employed in the capacity of clergy services are limited in the carriers and products available to maintain their favorable tax privileges. Mr. Hargis is also an owner of Hargis and Stevens PA, a Certified Public Accounting firm. Any compensation derived from his tax and accounting services are separate and apart from any activity performed through or with MBI.

MBI is owned and controlled by Coppell Advisory Solutions, LLC, an SEC registered investment adviser (CRD# 156549). Certain owners and Management Persons of Coppell Advisory Solutions, LLC are also employed by MBI in various capacities.

MBI is affiliated with Precision Capital Management, LLC (CRD#174239) and Varsity Asset Management, LLC (CRD#169295) through common control and ownership. Both firms are SEC registered investment advisers. Certain owners and Management Persons of Precision Capital Management, LLC and Varsity Asset Management, LLC are also employed by MBI in various capacities.

Additionally, MBI has retained Coppell Advisory Solutions, LLC a sub adviser and Varsity Asset Management, LLC as a third party adviser to manage its clients' portfolios and will share in the compensation received by these entities for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of affiliated firms. In order to address this conflict, MBI has adopted a code of ethics that obliges all associated persons to deal fairly with all clients when making investment decisions, to uphold their fiduciary duty at all times, and to put the client's interest first. Clients are not required to use the services of any third party advisers we recommend.

We will only recommend sub advisers with whom we have executed a written agreement and we will provide all clients with a written disclosure that includes our firm name, the sub adviser's name, the nature of the relationship, including any affiliation between our firm and the sub adviser; A statement that our firm will be compensated by the sub adviser; The terms of such compensation arrangement, including a description of the compensation paid to our investment adviser representatives; and compensation differentials, if any, charged to clients above the sub adviser's normal fee, as a result of the cost of obtaining clients by compensating our firm and investment adviser representatives.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11

Description of Our Code of Ethics

MBI has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes MBI's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of MBI's Code of Ethics is available upon request to Michael Wallin, Chief Compliance Officer, at (469) 778-3033 or by email at mwallin@ministrybenefit.com.

Personal Trading Practices

At times MBI and/or its Advisory Representatives may take positions in the same securities as clients, which may pose a conflict of interest with clients. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality, disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Brokerage Practices - Item 12

Due to the nature of our business, we do not recommend brokers or dealers to clients. Additionally, we do not receive Client referrals from broker-dealers and custodians. Clients who have implemented investments through a sub adviser will be required to use the broker dealers and/or custodians recommended by the sub adviser and or the portfolio managers used by the sub adviser.

Review of Accounts - Item 13

Portfolio Management Account Reviews

Accounts are reviewed by the Associated Person named as adviser of record on the account. The

frequency of reviews is determined based on the client's investment objectives, but reviews are conducted no less frequently than annually. More frequent reviews may also be triggered by a change in the client's investment objectives, tax considerations, large deposits or withdrawals, large purchases or sales, loss of confidence in corporate management, or changes in macro-economic climate.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Additionally, most sub advisers provide performance reports on a monthly or quarterly basis.

Client Referrals and Other Compensation - Item 14

We will recommend that you use a sub adviser and will share in the compensation received by the sub adviser for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the sub adviser. In order to address this conflict, the firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients when taking investment action and to uphold their fiduciary duty and to put the client's interest first. Clients are not required to use the services of any sub adviser we recommend.

We do not compensate individuals and/or entities for client referrals.

Custody - Item 15

MBI does not have custody of client funds.

Clients will receive account statements at least quarterly from their qualified custodian. Clients are urged to review their custodial account statements for accuracy.

Investment Discretion - Item 16

MBI does not take trading discretion over client accounts. However, we will assume discretionary authority to hire or fire the sub adviser where such action is deemed to be in your best interest. We also assume discretionary authority to reallocate client assets into a different asset allocation model managed by the same sub adviser.

Voting Client Securities - Item 17

MBI does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy

materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Financial Information - Item 18

We are required in this Item to provide you with certain financial information or disclosures about MBI's, financial condition. MBI does not require the prepayment of over \$1,200, six or more months in advance. Additionally, MBI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Requirements of State-Registered Advisers - Item 19

This section is not applicable. Our firm is SEC registered.

Miscellaneous

Confidentiality

MBI views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the firm has instituted policies and procedures to ensure that customer information is kept private and secure.

MBI does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, MBI may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

MBI restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. MBI maintains physical and procedural safeguards that comply with state and federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the firm's policy not to share information unless required to process a transaction, at the request of the client, or as required by law.

A copy of the firm's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the Advisory Agreement. Thereafter, the firm will deliver a copy of the current privacy policy notice to its clients on an annual basis. If you have any questions on this policy, please contact Michael Wallin, Chief Compliance Officer, at (469) 778-3033 or by email at mwallin@ministrybenefit.com.