

Item 1 – Cover Page
FORM ADV Part 2A

**Plotkin Financial Advisors, LLC
Doing Business As**

Plotkin Retirement Advisors

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February 2016

This brochure provides information about the qualifications and business practices of Plotkin Financial Advisors, LLC doing business as Plotkin Retirement Advisors. If you have any questions about the contents of this Brochure, please contact us at (301) 907-9790 and/or Sarah Hunt at Shunt@pfallc.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 Plotkin Financial Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Plotkin Financial Advisors, LLC is 127635.

Any references to Plotkin Financial Advisors, LLC doing business as Plotkin Retirement Advisors 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

February 2016

Item 4.E – Amended discretionary assets under management from \$130,802,000 as of December 31, 2014, to \$111,221,000 as of December 31, 2015.

Item 10 – Plotkin Retirement Advisors no longer has a related person who is a tax attorney.

December 2015

Item 4 and 5

- Added clarification about the services offered.
- Disclosed the fee payment schedule and details for the two third party administrators.

Item 14 – Added disclosure about incentive compensation that can be received on real estate investment products sold to foreign investors.

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.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was February 2016.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Sarah Hunt at (301) 907-9790 and/or at Shunt@pfallc.com. Additional information about Plotkin Financial Advisors, LLC is also available via the SEC's website www.adviser.sec.gov. The website also provides information about any persons affiliated with Plotkin Financial Advisors, LLC who are registered, or are required to be registered, as investment adviser representatives of Plotkin Financial Advisors, LLC.

Item 3 - **TABLE OF CONTENTS**

Item 1 – COVER PAGE.....	Cover Page
Item 2 - MATERIAL CHANGES	2
Item 3 - TABLE OF CONTENTS	3
Item 4 - ADVISORY BUSINESS	4
Item 5 - FEES AND COMPENSATION	5
Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT	7
Item 7 - TYPES OF CLIENTS	7
Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	7
Item 9 - DISCIPLINARY INFORMATION	8
Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	8
Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING	9
Item 12 - BROKERAGE PRACTICES	10
Item 13 - REVIEW OF ACCOUNTS	13
Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION	14
Item 15 - CUSTODY	15
Item 16 - INVESTMENT DISCRETION	15
Item 17 - VOTING CLIENT SECURITIES	16
Item 18 - FINANCIAL INFORMATION	16
Brochure Supplements	

Item 4 - ADVISORY BUSINESS

Plotkin Financial Advisors, LLC doing business as Plotkin Retirement Advisors is an investment advisory firm offering a variety of advisory services customized to your individual needs.

A. Plotkin Financial Advisors, LLC was established in 2003. Shimshon Plotkin is full owner.

B. Defined Contribution Plan Consulting Services

Plotkin Retirement Advisors offers defined contribution plan consulting services. The following services are offered:

- Non-discretionary investment advisory services to defined contribution plans (the Plan) with respect to the included assets as defined in accordance with the Plan's investment policies and objectives.
- Selection, monitoring and replacement of service providers.
- Fee and cost review comparison of existing Plan compared to existing options.
- Ongoing monitoring of investment options and Plan performance without providing specific investment recommendations.
- Participant education and enrollment support
- Assist in the development of the Plan's investment policy statement.
- Assist in the development of a fiduciary audit file.

The investment recommendations and advisory services offered by Plotkin Retirement Advisors are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. It is necessary to inform Plotkin Retirement Advisors promptly with respect to any changes to the Plan and investment goals and objectives. Failure to notify Plotkin Retirement Advisors of any such changes could result in investment recommendations not meeting the Plan's needs.

- C. Plotkin Retirement Advisors tailors advisory services to a company's needs. The Plan trustees may impose restrictions and/or limitations on the investing in certain securities or types of securities offered in the Plan. Plotkin Retirement Advisors will meet with Plan trustees at a frequency agreed upon and customize services to the Plan.
- D. A wrap program is not offered under the name of Plotkin Retirement Advisors. Plotkin Financial Advisors, LLC offers a wrap program to retail clients.
- E. Plotkin Financial Advisors, LLC offers asset management services to individual clients. Plotkin Financial Advisors, LLC as of December 31, 2015, we have approximately \$111,221,000 of client assets under our discretionary management and no assets under non-discretionary management

Item 5 - FEES AND COMPENSATION

- A. Fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds.

No fee adjustments will be made for additional deposits to the Plan or partial withdrawals from the Plan or for account appreciation or depreciation.

Plotkin Retirement Advisors will quote the Plan a fee based on the fee range below. The fee will be determined based on several factors including size and complexity of the Plan, complexity of services, and number educational seminars per year.

Fees will range from .40% to .50% of plan assets

- B. Plotkin Retirement Advisors will direct its fee invoices to the third party administrator. Payment to Plotkin Retirement Advisors must be made payable to Plotkin Financial Advisors, LLC within 30 days of receipt of the invoice.
- C. In addition to Plotkin Retirement Advisors' advisory fee above, the Plan and/or Plan participants will pay third party administrator fees, custodial fees, account maintenance fees and other fees associated with maintaining the Plan Account. Such fees are not charged by Plotkin Retirement Advisors and are charged by the product, broker/dealer or account custodian. Plotkin Retirement Advisors does not share in any portion of such fees. Additionally, the Plan and/or Plan participants may pay a proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund purchased. Such advisory fees are not shared with Plotkin Retirement Advisors and are compensation to the fund-manager.
- D. Plotkin Retirement Advisors' fee will be paid either quarterly in advance or monthly at the end of each month depending on the third party administrator selected by the Plan.
- 1) Fees billable quarterly in advance: Advisory fees will be charged in advance of each calendar quarter based upon the value of the Plan assets on the last business day of the just completed calendar quarter.

Adviser has the discretion to charge a prorated advisory fee for a partial quarter should this Agreement be executed on a day other than the first day of a calendar quarter.

- 2) Fees billable monthly in arrears: Advisory fees will be calculated on a daily basis based on the value of the Plan assets at the close of the business day and will be charged to the Plan in arrears at the end of each month.

Adviser will issue a prorated refund of a prepaid fee if services are terminated as of a day other than the last day of a calendar quarter subject to the Termination provision below. The Plan will be charged advisory fees for the period up to the termination date.

Plotkin Retirement Advisors

- E. Plotkin Retirement Advisors will not receive trail compensation or any other additional compensation on Plan assets other than its advisory fee invoiced to the third party administrator on Plan.

The following disclosures apply to retail clients participating in advisory services offered by Plotkin Financial Advisors, LLC:

Advisory Representatives of Plotkin Retirement Advisors are dually registered representatives of Independent Financial Group, LLC (“IFG”), a registered broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and SIPC. Advisory Representatives of Plotkin Retirement Advisors who are Registered Representative may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through IFG. 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 your assets. 12b-1 fees may be initially paid to IFG and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the 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.

For its retail clients, Plotkin Financial Advisors, LLC has the option to recommend mutual funds that pay 12b-1 fees and no-load funds. Retail clients can purchase the securities recommended by Plotkin Financial Advisors, LLC directly or through other brokers or agents not affiliated with Plotkin Financial Advisors, LLC.

These practices present a conflict of interest and give Plotkin Financial Advisors, LLC an incentive to recommend investment products based on the compensation received, rather than on a client’s needs. Plotkin Financial Advisors, LLC will attempt to mitigate conflicts of interest by:

- Informing you of the conflict of interest in this Disclosure Brochure.
- Maintaining and abiding by our Code of Ethics which requires us to place your interest first and foremost.
- Routine review of transactions
- Advising you of the right to decline to implement our recommendations and the right to choose other financial professionals for implementation.
- Recognizing and advising you Plotkin Financial Advisors, LLC is a fiduciary as a registered investment adviser and has an obligation to conduct its business in the best interest of its clients and not in Plotkin Financial Advisors, LLC’s interest.

Termination Provisions

Plan may terminate investment advisory services obtained from Plotkin Retirement Advisors, without penalty, upon written notice within thirty (30) business days after entering into the advisory agreement with Plotkin Retirement Advisors. The Plan will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account. Thereafter, the Plan may terminate investment advisory services upon delivery of your notice to terminate to Plotkin

Retirement Advisors. Should the Plan terminate advisory services during a calendar quarter, the Plan will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the calendar quarter.

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

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

Item 7 - TYPES OF CLIENTS

Plotkin Retirement Advisors' services are geared toward defined contribution plans.

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

- A. The services offered by Plotkin Retirement Advisors to a Plan are limited to education services offered to Plan participants. Plotkin Retirement Advisors does not participate in selecting in the securities to be offered in the Plan as investment options and does not provide pension consulting services to the Plan trustees. The educational materials used with Plan participants will be provided directly by the investment product sponsors whose products are offered in the Plan.
- B. Investing in securities involves risk of loss, including the potential loss of principal. Therefore, a client must be prepared to bear the risk of loss and fluctuating performance.

Plotkin Retirement Advisors does not represent, warrant or imply that the services or methods of analysis used by Plotkin Retirement 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 Plotkin Retirement Advisors will provide a better return than other investment strategies.

- C. Plotkin Retirement Advisors does not recommend specific securities holdings in the Plan. Plotkin Retirement Advisors does provide education and limited investment guidance to Plan participants based on the securities options in the Plan.

The risks with mutual funds include

- Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.

- Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Exchange Traded Funds (ETFs) risks include:

- ETFs are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day.
- ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.
- While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e. borrow money) to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities.

These are some of the primary risks associated with the types of securities holdings that may be offered in the Plan. Please do not hesitate to contact us to discuss these risks and others in more detail. 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 Plotkin Retirement Advisors will direct the client to the appropriate web page to access the prospectus.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

Item 9 - DISCIPLINARY INFORMATION

There is no reportable disciplinary information required for Plotkin Retirement Advisors or its management persons that is material to your evaluation of Plotkin Retirement 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 Plotkin Financial Advisors, LLC and as a registered representative of IFG. A client has the right to purchase or sell securities through Plotkin Financial Advisors, LLC Advisory Representatives or another financial professional. However, if a client chooses to purchase or sell securities products through Plotkin Financial Advisors, LLC Advisory Representatives, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher

or lower at IFG than at other broker/dealers. Advisory Representatives have a conflict of interest in having a client purchase securities and/or insurance related products through IFG in that the higher their production with IFG the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of the FINRA, IFG has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of IFG. For such supervisory functions, Plotkin Financial Advisors, LLC may pay IFG a portion of the advisory fees they receive. IFG and Plotkin Financial Advisors, LLC doing business as Plotkin Retirement Advisors are not affiliated.

B-C. Plotkin Financial Advisors, LLC doing business as Plotkin Retirement 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, Plotkin Retirement Advisors is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; 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; insurance company or agency; pension consultant; or sponsor or syndicator of a limited partnership.

Plotkin Financial Advisors, LLC attempts to mitigate the conflicts of interest (i.e. the potential receipt of commissions if recommendations are implemented) by providing these disclosures. Other professionals should always be consulted for an opinion and recommendations can be implemented through other financial professionals. Furthermore, as a registered representative with IFG, Advisory Representatives are subject to a supervisory structure at IFG over their securities business.

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

Code Of Ethics

A. Plotkin Retirement Advisors has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Plotkin Retirement Advisors takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as Plotkin Retirement Advisors' policies and procedures. Further, Plotkin Retirement 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 Plotkin Retirement Advisors' Privacy Policy. As such, Plotkin Retirement 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, Plotkin Retirement Advisors' Code of Ethics establishes Plotkin Retirement Advisors' expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Plotkin Retirement Advisors

- B. Neither Plotkin Retirement 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. Plotkin Retirement Advisors and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, Plotkin Retirement 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. Plotkin Retirement Advisors and its associated persons will not put their interests before your interest. Plotkin Retirement Advisors and its associated persons will not trade in a manipulative manner, in way to harm clients, and/or in a way violate insider trading policies.
- D. Plotkin Retirement 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

Plotkin Retirement 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 IFG. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from IFG unless IFG provides them with written authorization. IFG prohibits Plotkin Financial Advisors, LLC doing business as Plotkin Retirement Advisors from directing trades to another broker/dealer other than TD Ameritrade and Schwab Institutional division of Charles Schwab & Co., Inc. (“Schwab”). Additionally, Plotkin Financial Advisors, LLC doing business as Plotkin Retirement Advisors has access to Pershing through Advisory Representative’s relationship with IFG.

Plotkin Retirement Advisors does not maintain custody of Plan assets. Plan assets must be maintained in an account at a “qualified custodian,” generally a broker- dealer or bank.

Plotkin Financial Advisors, LLC recommends retail clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, or TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA (“TD Ameritrade “), an unaffiliated SEC-registered broker-dealer and FINRA member, as the qualified custodians. We are independently owned and operated and are not affiliated with Schwab or TD Ameritrade. Schwab or TD Ameritrade will hold client assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that a retail client use Schwab or TD Ameritrade as custodian/broker, the client will decide whether to do so and will open an account with Schwab or TD Ameritrade by entering into an account agreement directly with them. Plotkin Financial Advisors,

Plotkin Retirement Advisors

LLC does not open the account for retail clients, although we may assist them with paperwork required to establish an account. If a retail client does not wish to place assets with Schwab or TD Ameritrade, then we cannot provide management services.

Plotkin Financial Advisors, LLC is independently owned and operated and not affiliated with IFG, Pershing, Schwab or TD Ameritrade.

Not all investment advisers require clients to maintain accounts at a specific broker/dealer. Clients may maintain accounts at another broker/dealer and select a discount broker/dealer.

In initially selecting IFG, TD Ameritrade and Schwab, Plotkin Financial Advisors, LLC conducted due diligence. Plotkin Financial Advisors, LLC' evaluation and criteria includes:

- Ability to service
- Staying power as a company
- Industry reputation
- Ability to report to the client and to Plotkin Financial Advisors, LLC
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of client information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

There is an incentive for Plotkin Financial Advisors, LLC and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than a client's best interest.

TD Ameritrade

TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Plotkin Financial Advisors, LLC receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14. below.)

Schwab

Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our

clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab's support services:

Services That Benefit the Client.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit the client.

Services That May Not Directly Benefit the Client.

Schwab also makes available to us other products and services that benefit us but may not directly benefit the client. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that a client maintain their account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on a client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. We

believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

Independent Financial Group, LLC

IFG has a wide range of approved securities products for which IFG performs due diligence prior to selection. IFG registered representatives are required to adhere to these products when implementing securities transactions through IFG. Commissions charged for these products may be higher or lower than commissions a client may be able to obtain if transactions were implemented through another broker/dealer. IFG also provides Advisory Representatives, and therefore Plotkin Financial Advisors, LLC, 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 Plotkin Financial Advisors, LLC manage and further develop its business enterprise.

IFG and its clearing broker/dealer, Pershing, LLC, make available to Plotkin Financial Advisors, LLC other products and services that benefit Plotkin Financial Advisors, LLC but may not directly benefit a Client. Some of these other products and services assist Plotkin Financial Advisors, LLC with managing and administering client accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; 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 Plotkin Financial Advisors, LLC' accounts, including accounts not held through IFG. Plotkin Financial Advisors, LLC receives a benefit because Plotkin Financial Advisors, LLC does not have to produce or pay for the research, products or services. Plotkin Financial Advisors, LLC may have an incentive to select or recommend a broker-dealer based on Plotkin Financial Advisors, LLC's interest in receiving the research or other products or services, rather than on our clients' interest in receiving most favorable execution.

Block or Trade Aggregation

Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

Item 13 - REVIEW OF ACCOUNTS

- A. Plotkin Retirement Advisors' advisory services are limited to participant education. Plotkin Retirement Advisors will meet with Plan participants at a frequency as requested and/or established by the Plan. The Plan will advise Plotkin Retirement Advisors of the frequency of participant meetings and educational events.

The following individuals conduct reviews:

Michael Edberg, Advisory Representative
Ittai Dvir, Advisory Representative
Shimshon Plotkin, Advisory Representative

- B. Reviews are conducted with Plan participants on a voluntary basis.
- C. The Plan will be provided statements at least quarterly direct from the account custodian.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

A. Schwab

Plotkin Financial Advisors, LLC receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab’s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

TD Ameritrade

As disclosed under Item 12 above, Plotkin Financial Advisors, LLC participates in TD Ameritrade’s institutional customer program and Plotkin Retirement Advisors may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Plotkin Financial Advisors, LLC’s participation in the program and the investment advice it gives to its Clients, although Plotkin Financial Advisors, LLC receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Plotkin Financial Advisors, LLC participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Plotkin Financial Advisors, LLC by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Plotkin Financial Advisors, LLC’ related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Plotkin Financial Advisors, LLC but may not benefit its Client accounts. These products or services may assist Plotkin Financial Advisors, LLC in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Plotkin Financial Advisors, LLC manage and further develop its business enterprise. The benefits received by Plotkin Financial Advisors, LLC or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Plotkin Financial Advisors, LLC endeavors at all time to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Plotkin Financial Advisors, LLC or its related persons in and of itself

creates a potential conflict of interest and may indirectly influence Plotkin Financial Advisors, LLC choice of TD Ameritrade for custody and brokerage services.

Other Product Vendors

Product vendors recommended by Plotkin Financial Advisors, LLC may provide monetary and non-monetary assistance with client events, provide educational tools and resources. Plotkin Financial Advisors, LLC does not select products as a result of any monetary or non-monetary assistance. The selection of product that is in the client's best is first and foremost. Plotkin Financial Advisors, LLC's due diligence of a product does not take into consideration any assistance it may receive. It is considered by regulators to be a conflict of interest for an investment adviser such as Plotkin Financial Advisors, LLC to receive monetary and/or non-monetary assistance from product vendors even if for the direct or indirect benefit of the investment adviser's clients.

Plotkin Financial Advisors, LLC has agreements with various alternative investment sponsors for exclusivity to offer alternative investment products to Israeli citizens. **Additionally, many of the alternative investment sponsors pay an incentive or bonus commission to advisory representatives who are registered representatives for any units of the programs purchased by international investors. This is a conflict of interest. To help mitigate this conflict of interest, all sales of units of any alternative investment must flow through the broker/dealer with which the advisory representative is registered and the applications go through a suitability review.**

- B. Plotkin Retirement Advisors does not compensate individuals or entities for referrals to Plotkin Retirement Advisors.

Item 15 - CUSTODY

Plotkin Retirement Advisors does not take custody of Plan cash, securities and/or assets. As referenced in Item 5, Plotkin Retirement Advisors' advisory fees are billed directly to the third party administrator and are not taken directly by Plotkin Retirement Advisors from Plan assets.

Item 16 - INVESTMENT DISCRETION

Plotkin Retirement Advisors does not exercise discretion over Plan assets or a participants' account. The decision to replace a security vehicle or option remains with the Plan trustees. Plan participants decide and execute their own allocations.

Item 17 - VOTING CLIENT SECURITIES

Plotkin Retirement 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 Plotkin Retirement Advisors about questions you may have and for options on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 - FINANCIAL INFORMATION

- A. Plotkin Retirement Advisors will not require a Plan to prepay more than \$1200 and six or more months in advance of receiving the advisory service.
- B. Plotkin Retirement Advisors is financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Neither Plotkin Retirement Advisors nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.