

Investment Advisor Brochure

Form ADV Part 2A

March 29, 2024



INTERVEST INTERNATIONAL, INC.

1980 Dominion Way, Suite 202
Colorado Springs, CO 80918
(719) 592-9299
www.intervestintl.com

This Brochure provides information about the qualifications and business practices of Intervest International, Inc. ("Intervest"). If you have any questions about the contents of this Brochure, please contact us at (719) 592-9299 or by email at main@intervestintl.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.

Intervest International, Inc. is registered with the Securities and Exchange Commission (SEC) as a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training.

Additional information about Intervest International, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This item provides a summary of material changes, if any, Intervest has made to the brochure since the last annual update, dated March 31, 2023.

Item 4 – Advisory Business, was revised to update our Assets Under Management as of December 31, 2023. This is considered to be a non-material change.

Will I receive a brochure every year?

We may, at any time, update this Brochure. Any material changes will either be sent to you as a summary of those changes or, depending on the extent of these changes, you will receive the entire updated Brochure.

When there are material changes, you will receive this information within 120 days of the close of our fiscal year.

May I request additional copies of the brochure?

You may request and receive additional copies of this brochure in one of three ways:

- Contact your Intervest Advisor Representative.
- Download the brochure from the SEC website at www.adviserinfo.sec.gov. Select “investment adviser firm” and type in our Firm name.
- Contact our Compliance Department at (719) 592-9299 or compliance@intervestintl.com.

Item 3 -Table of Contents

Item 1 – Cover Page	
Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Advisory Services offered through Third-Party Money Managers.....	4
Individually Managed Account Services.....	4
Financial Planning Services	5
Item 5 – Fees and Compensation	5
Advisory Services offered through Third-Party Money Managers.....	6
Individually Managed Account Services.....	6
Financial Planning Services	7
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	9
Item 10 – Other Financial Industry Activities and Affiliations	9
Item 11 – Code of Ethics	10
Item 12 – Brokerage Practices	11
Item 13 – Review of Accounts	12
Item 14 – Client Referrals and Other Compensation	13
Item 15 – Custody.....	13
Item 16 – Investment Discretion.....	13
Item 17 – Voting Client Securities	14
Item 18 – Financial Information.....	14

Item 4 – Advisory Business

Intervest International, Inc. (“Intervest”) is a Registered Investment Advisor which specializes in total financial planning for families, business executives, and small business owners as well as military and government personnel. Intervest has been in business since 1980 and our principal owner is David M. Smith, CFP®, Chief Executive Officer.

We feature an exclusive group of Certified Financial Planner™ certificants and investment advisor representatives (collectively, “Advisor Representatives”) who provide complete and objective financial advice for our clients. Intervest also provides professional asset management, both directly as well as through selected Third-Party Money Managers.

Through our programs and services, we help you avoid the problems caused by inflation, taxes and money mismanagement — all vital issues in today's rapidly changing economy. We focus on alternative solutions and provide effective recommendations designed to achieve financial success for those we serve.

Our approach to the changing problems and opportunities that make up today's economy is unique. We apply financial planning principles and techniques that are custom designed for you. We do not represent any one company; instead, we represent the needs of our clients by providing solutions that are both objective and comprehensive. Your financial planning goals are, and will always be, first and foremost.

Intervest offers several different types of investment advisory services including Advisory Services offered through Third-Party Money Managers, Individually Managed Account Services, and Financial Planning Services, collectively referred to as “Advisory Services.”

Advisory Services offered through Third-Party Money Managers

Intervest offers investment advisory services to you in conjunction with several third-party money management programs. This allows us to offer individual advice on these specialized money management programs sponsored by other investment advisors.

Individually Managed Account Services

Intervest offers Individually Managed Account Services which may include any or all of the following, as agreed upon between you and Intervest:

- Monitoring the performance of an existing portfolio;
- Periodically rebalancing a portfolio to an agreed-upon model allocation; or,
- Recommending and modifying specific portfolio assets on a nondiscretionary basis.

Certain Individually Managed Accounts may be margin accounts. A margin account is an account where you may borrow funds for the purpose of purchasing additional securities. You may also use a margin account to borrow money to pay for fees associated with your account or to withdraw funds. If you decide to open a margin account, please carefully consider the following:

- If you do not have available cash in your account and use margin, you are borrowing money to purchase securities, pay for fees associated with your account or withdraw funds.
- You are using the securities that you own as collateral.
- Money borrowed is charged an interest rate that is subject to change over time.
- Your Advisor Representative has a conflict of interest when recommending that you purchase or sell securities using borrowed money. This conflict occurs because your advisory fee is based on the total market value of the securities in your account. If you

have a margin debit balance (in other words you have borrowed and owe money to the account custodian), your margin debit balance does not reduce the total market value. In fact, since you have borrowed money to purchase additional shares, the total market value of your account will be higher, which results in a higher advisory fee.

We reduce this conflict by requiring all margin accounts to be pre-approved by the home office. We also review accounts to determine whether or not the use of margin is appropriate and in line with your goals and objectives. Please also carefully review the margin disclosure document for additional risks involved in opening a margin account.

Financial Planning Services

Intervest provides financial planning services and investment advice through comprehensive reviews of personal, business, family, and estate information and documents which you provide. Written reports or plans are created for you and reviewed in detail. Information provided and reports created may include a review of general securities holdings, employee benefit programs, and business operations.

Assets Under Management

As of December 31, 2023, Intervest managed a total of \$93,584,000 in client assets, as follows:

- | | |
|--|--------------|
| • Advisory Services through Third-Party Money Managers (non-discretionary) | \$52,384,000 |
| • Individually Managed Accounts (non-discretionary basis) | \$41,200,000 |
| • Individually Managed Accounts (discretionary basis) | \$0 |

Item 5 – Fees and Compensation

The specific manner in which fees are charged by Intervest is established in the written agreement between you and Intervest. All fees are subject to negotiation. Fees are generally automatically deducted from your advisory account. You may terminate any Investment Advisory Agreement within 5 business days of signing without penalty.

Intervest's fees are exclusive of transaction fees, ticket charges, and other related costs and expenses which shall be incurred by you. Typical charges include those imposed by custodians, brokers, and other third parties such as custodial fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges and fees are exclusive of and in addition to Intervest's fee, and Intervest shall not receive any portion of these charges, fees, and costs.

You should be aware that the compensation to Intervest International, Inc. and your Advisor Representative will differ according to the specific advisory program chosen. This compensation to Intervest and your Advisor Representative may be more than the amounts we would otherwise receive if you participated in another program or paid for investment advice, brokerage, and/or other relevant services separately. As a result of the difference in fee schedules among the various advisory programs and services offered by Intervest and your Advisor Representative, we may have a financial incentive to recommend a particular program or service over other programs or services.

Advisory Services offered through Third-Party Money Managers

When offering Investment Advisory Services in conjunction with a Third-Party Money Manager (TPMM), the fee charged is a percentage of assets under management. The maximum annual fee (split between Intervest and the third-party manager) is as follows:

<u>Account Value:</u>	<u>Maximum Annual Fee:</u>
\$0 to \$500,000	2.99%
\$500,000.01 to \$1,000,000	2.75%
\$1,000,000.01 to \$2,500,000	2.25%
\$2,500,000.01 to \$5,000,000	2.00%
\$5,000,000.01 and above	1.75%

When offering Investment Advisory Services through a Third-Party Money Manager, Intervest and the Advisor Representative serve as a solicitor for the Third-Party Money Manager. The Third-Party Money Manager shall collect the total fee and remit a portion to Intervest. The nature of the relationship, the total fee, and the allocation of the fee between Intervest and the Third-Party Money Manager, shall be fully disclosed to you in the Intervest Investment Advisory Agreement.

The account will be billed by the Third-Party Money Manager in accordance with the billing schedule employed by the Third-Party Money Manager.

Individually Managed Account Services

When offering Individually Managed Account Services, a percentage of assets under management is charged for advisory services. The maximum annual fee is as follows:

<u>Account Value:</u>	<u>Maximum Annual Fee:</u>
\$0 to \$500,000	2.99%
\$500,000.01 to \$1,000,000	2.75%
\$1,000,000.01 to \$2,500,000	2.25%
\$2,500,000.01 to \$5,000,000	2.00%
\$5,000,000.01 and above	1.75%

Intervest will generally bill its fees on a quarterly or monthly basis, in advance, unless otherwise agreed to in writing. This means that you are charged for advice in the following billing period (quarter or month) and not for past advice. Fees are automatically deducted from your advisory account. If you terminate your account prior to the end of the billing period, we will refund any advisory fees owed to you on a prorated basis. The prorated refund is based on the number of days remaining in the billing period.

Financial Planning Services

Intervest generally charges either an hourly fee for advisory services provided or a fixed fee for the creation and review of a personalized financial plan.

Hourly Fees

Hourly fees are set by each Intervest Advisor Representative. Hourly fees are negotiable and agreed upon in advance. The maximum allowable hourly rate is \$350.00 per hour. You will be billed directly for hourly fees incurred. You may terminate any Financial Planning Agreement within 5 business days of signing without penalty, in which case any pre-paid hourly fees will be refunded in full. If the agreement is terminated after 5 business days, and the Advisor Representative has started to expend time on your behalf, you agree to pay the agreed upon hourly rate for all such time expended.

We do not take prepayment of more than \$1,200 in fees, six months or more in advance.

Fixed Fees

A fixed fee may be charged for the creation and review of a personalized financial plan, or a business operational, succession, educational funding, or estate plan. Fixed fees are negotiable and are agreed upon in advance by you and your Advisor Representative based on the nature and detail of the plan you request. Fixed fees are collected in advance at the time the financial planning agreement is signed. You may terminate any Financial Planning Agreement within 5 business days of signing for a full refund of any prepaid fees. If the agreement is terminated after 5 business days, and the Representative has started to expend time on your behalf, you agree to pay a percentage of the fixed fee based on the percentage of work completed. Any prepaid fees collected in excess of the earned amount will be refunded.

We do not take prepayment of more than \$1,200 in fees, six months or more in advance.

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

Intervest does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets). Intervest has entered into solicitation agreements with Third-Party Money Managers who themselves may charge performance-based fees (see Item 14 - Client Referrals and Other Compensation, below). The details, including the method of calculation, of any such performance-based fee shall be disclosed in the Third-Party Money Manager's Form ADV Part 2A and/or client agreement, and Intervest's solicitation fee shall be disclosed as part of Intervest's Investment Advisory Agreement.

Item 7 – Types of Clients

Intervest provides investment advisory services primarily to individuals, families and small businesses. We also provide services to pension and profit-sharing plans, trusts, estates, charitable organizations, foundations, endowments, corporations and other business entities. Intervest does not have a minimum account size; however, some of the Third-Party Money Managers with whom we provide investment advisory services have minimum account sizes.

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

Intervest's Advisor Representatives use various analysis methods and investment strategies when formulating investment advice or managing your assets. The analysis methods available to Intervest's Advisor Representatives include, but are not limited to:

-
- **Fundamental analysis.** Fundamental analysis is a method of evaluating securities by examining related economic, financial and other qualitative and quantitative factors. These factors include macroeconomic factors, such as the overall economy and industry conditions, and company-specific factors, such as a company's management and financial condition.
 - **Technical analysis.** Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and trading volume. This method attempts to identify patterns that can suggest future activity.
 - **Cyclical analysis.** Cyclical analysis is a method of evaluating securities by analyzing how they perform at various stages in a business cycle. Cyclical companies typically provide products or services that are in lower demand at certain points in a business cycle and in higher demand at other points in the same business cycle.

Investment's Advisor Representatives develop each recommended investment strategy by combining analysis results with your particular financial goals and objectives, risk tolerance, tax bracket, investment timeframe, and other relevant factors or guidance that you provide. Investment strategies may incorporate any or all of the following:

- **Buy-and-hold**, in which an asset is purchased and held until it is sold to provide funding for a financial goal, objective, or need.
- **Dollar-cost averaging**, in which equal, periodic purchases of a particular security are made in an effort to take advantage of price volatility by purchasing more shares or units when the price is low and purchasing fewer shares or units when the price is high, thus reducing the average cost per share or unit.
- **Passive asset allocation**, in which a portfolio is periodically rebalanced to match a particular asset percentage mix.
- **Active asset allocation**, which can involve any or all of the following:
 - **Tactical asset allocation**, which attempts to take advantage of short-term changes in asset values through frequent trading into and out of various assets, including cash or cash equivalents;
 - **Strategic asset allocation**, which attempts to take advantage of long-term changes in asset values through occasional trading into and out of various assets, including cash or cash equivalents; and,
 - **Sector rotation**, which attempts to use various points in a business cycle to determine which securities, in which market sectors, to buy or sell.
- **Short sales, options, or other hedging strategies** that are designed to reduce volatility or take advantage of price declines in specific assets or market declines in general.

Every analysis method and investment strategy involves risk. For example:

- **Fundamental analysis** that is positive for a particular company's securities can be affected by unexpected macroeconomic events, significant changes in the company's market sector, or unexpected changes to the company's management or financial condition.
- **Technical analysis** that indicates a particular market trend is a prediction only, based on past performance, and is no guarantee of future results.

-
- Recommendations from cyclical analysis as to when to buy or sell a specific security or securities in a specific market sector may no longer be valid if the business cycle is disrupted, compressed, or lengthened.
 - A buy-and-hold strategy does not protect you in a declining market and will not protect you in situations in which a security become worthless or significantly devalued.
 - A dollar-cost averaging strategy depends on your ability to continue periodic investments over a long enough time to take advantage of price variations and will not guarantee a positive return in a declining market.
 - A passive asset allocation strategy will not guarantee a positive return in a declining market and may require modification if the asset allocation model in use is no longer appropriate because of changes in your overall financial situation.
 - An active asset allocation strategy depends on timely moves into and out of various assets and asset categories and can fail if the moves are mis-timed. Frequent trading can affect overall portfolio performance because of increased transaction costs and taxes.
 - Short sales, options, and other hedging strategies are used in anticipation of price moves in a particular direction and can be more costly or less effective if prices move in the opposite direction.

Although Intervest's Advisor Representatives seek to manage risk by implementing an investment strategy tailored to your specific financial situation, no analysis method or investment strategy can guarantee positive results. Investing in securities involves a risk of loss that you should be prepared to bear.

Item 9 – Disciplinary Information

Intervest International, Inc. reached agreement with the Securities and Exchange Commission (SEC) on June 14, 2021, to settle matters related to breach of fiduciary duty in connection with purchases of certain unit investment trusts (UITs) and mutual funds in advisory client accounts. The SEC's order finds that Intervest violated Section 206(2) of the Investment Advisers Act of 1940. Without admitting or denying the findings in the SEC's order, Intervest agreed to a cease-and-desist order and to pay a total of approximately \$205,489 in disgorgement of transaction costs, penalties, and interest.

Intervest's disclosure history is available on the SEC's website at www.adviserinfo.sec.gov.

Item 10 – Other Financial Industry Activities and Affiliations

Intervest is the parent company of Intervest International Equities Corporation (IIEC), a FINRA broker/dealer. Most of Intervest's Advisor Representatives are also registered representatives of IIEC. As such, they execute securities transactions, such as the purchase or sale of stocks, bonds, mutual funds, variable annuities or variable life products, for their advisory clients. As a result of these transactions, dually registered individuals earn brokerage commissions from IIEC in addition to the compensation they receive through Intervest.

Intervest is also an insurance agency and many of Intervest's Advisor Representatives are licensed life and health insurance agents. In addition to providing investment advisory services, an Intervest Representative may recommend the purchase of life and/or health insurance. Intervest's fiduciary duty does not extend to sales of annuities and insurance products; rather, these products are offered under a best interest or suitability standard.

Since Intervest and IIEC are affiliated companies, this is considered a conflict of interest. To mitigate this conflict of interest, Intervest routinely reviews your accounts to ensure that the advisory services and product sales being recommended are consistent with your stated goals and objectives.

If you purchase securities or insurance products through your Advisor Representative, they will receive normal commissions, in addition to advisory fees. As such, your Advisor Representative may have an incentive to sell you commissionable products which presents a conflict of interest because they have an interest in making commissions on sales in addition to receiving fees on advisory services. You may have the option of holding certain assets outside of your advisory account and thereby avoiding advisory fees. Alternatively, they may have an incentive to forego providing you with advisory services when appropriate, and instead recommend the purchase of commissionable investments, if they deem that the payout for recommending the purchase of these investments would be higher than providing management advice on these products for an advisory fee. Therefore, a conflict of interest may exist between their interests and your interests. While our security sales are reviewed by an appointed supervisor to ensure our recommendations are in your best interest, you should be aware of the incentives we have to sell certain securities products and are encouraged to ask us about any conflict presented. Please be aware that you are under no obligation to purchase products or services recommended by us, members of our Firm, or a related entity in connection with providing you with any advisory services.

Because your Advisor Representative may have the ability to offer advisory and brokerage services, your Advisor Representative may be conflicted as to the investment options they recommend. In a brokerage account, your Advisor Representative is paid based on a transactional basis. In an advisory account, your Advisor Representative is compensated based on an advisory fee that is a percentage of the assets under management. Your investment needs, as well as associated account expenses, should influence your decision whether to open an advisory or a brokerage account. An advisory account can be more suitable if you are looking for a long-term investment strategy, quarterly performance reporting, and an ongoing relationship with your Advisor Representative.

Item 11 – Code of Ethics

Intervest is committed to providing brokerage services and/or investment advice with the utmost professionalism and integrity.

To help us avoid potential conflicts, we have developed a Code of Ethics designed to protect our professional reputation and comply with federal or other applicable securities laws. This Code of Ethics sets forth guidelines and restrictions for personal securities trading, including an absolute prohibition of trading on the basis of “inside” (i.e., material, non-public) information. Adherence to our code of ethics is a condition of employment or affiliation with the Firm. Our Code of Ethics is summarized as follows:

Personal Investing by Your Advisor Representative

Your Advisor Representative may purchase or sell the same security as you. This type of trading activity creates a conflict between your Advisor Representative and you because your Advisor Representative’s transaction may receive a better price than your transaction. Our Code of Ethics places restrictions on your Advisor Representative’s personal trading activities. These restrictions include a prohibition on trading based on non-public information, pre-clearance requirements for certain personnel transactions with advance knowledge of model transactions and a requirement that any personal securities transactions do not disadvantage clients or otherwise raise fiduciary or antifraud issues. Also, your Advisor Representative cannot purchase securities in an initial public offering or participate in a private placement without our written approval.

Personal Holdings and Transaction Reporting

We receive information of the security transactions purchased and/or sold by your Advisor Representative in their personal accounts. We also receive information listing all securities that they currently own in their personal securities accounts. Certain investments are not required to be reported to us by your Advisor Representative, such as mutual funds holdings and securities issued by the Government of the United States.

You may request a copy of our Code of Ethics at any time by contacting your Advisor Representative.

Item 12 – Brokerage Practices

Individually Managed Accounts

Transactions for Individually Managed Accounts are placed through a broker-dealer approved by Intervest. During the account opening process, you authorize Intervest to open a custodial account with a broker-dealer such as Pershing or Schwab, and to transfer your account to such other clearing firm as Intervest may determine.

We have negotiated competitive pricing and services with Charles Schwab & Co., Inc. (“Schwab”) for the benefit of our clients. Schwab offers their clients substantial financial strength and stability, economies of scale, and reliable, state-of-the-art technology.

Intervest does not receive research or other products or services other than execution from any broker-dealer or third party in connection with your securities transactions (soft dollar benefits). We do not consider, in selecting or recommending broker-dealers, whether we or a related person receives client referrals from a broker-dealer or third party. In addition, you do not generally have the option to direct securities brokerage transactions to other broker-dealers or other account custodians when you open an Individually Managed Account with Intervest.

Most of Intervest’s Advisor Representatives are also registered representatives with Intervest’s subsidiary broker/dealer, Intervest International Equities Corporation (“IIEC”) which allows them to perform brokerage services for you by executing specific security transactions. See the section titled “Other Financial Industry Activities and Affiliations” in Item 10 for further discussion of the conflict this presents.

Advisory Services offered through Third-Party Money Managers

Accounts for which Intervest provides advisory services in conjunction with Third-Party Money Managers may be maintained at outside broker-dealers utilized by the Third-Party Money Manager. Intervest does not receive any compensation for execution of transactions in such accounts. For more information about the brokerage practices of a Third-Party Money Manager (TPMM), clients should refer to the disclosure brochure for the applicable TPMM.

Block Trading

Block Trading refers to the aggregation of multiple orders from different clients, for the same securities for submission as a single order for execution. When the purchase or sale of a particular security is appropriate for more than one client account, trades for advisory clients may be aggregated. This is done principally to ensure that clients are treated fairly, and that one client is not advantaged at the expense of another client. Trades with advisory clients may be aggregated with those of other clients of your Advisor Representative.

Aggregate orders may be filled through multiple executions at different prices during the course of a trading day. If your order is aggregated with other orders, you will receive an average price. Aggregate orders will not reduce your transaction costs. When an aggregated order is only partially filled, the trading system will

allocate the pro-rata number of shares to your account based on your account's proportion of the overall order.

Intervest's policies do not require your Advisor Representative to block trade client orders. When an Advisor Representative chooses not to aggregate client orders for the same security a conflict of interest exists. In such instances, the Advisor Representative must decide which client order to place first which may result in one client receiving a better execution price over another client and could lead to certain client accounts receiving more favorable order executions over time. Intervest does not monitor Advisor Representatives choosing not to aggregate orders to determine whether any one client or group of clients is systematically disadvantaged over time.

Clients that are not included in block trading of other client accounts may receive a higher or lower price than clients that have been included in a block trading order. To ensure that no client or group of clients is favored over another, Intervest monitors the block trading activity with respect to clients that are not included in block trades with other clients of an Advisor Representative.

Best Execution

Intervest is obligated to ensure orders are being sent to the markets in an efficient manner and to execute any transactions in the manner it believes is in the client's best interest. Intervest's primary consideration with regard to purchases and sales for its clients is obtaining the most favorable execution of the transactions needed to implement client's investment strategy. The determinative factor is whether the transaction represents the best qualitative execution for the client account and not whether the lowest possible price is obtained. Intervest reviews reports that help analyze the quality of the executions of the orders that are sent to the market.

Intervest periodically and systematically reviews its executing broker-dealer's execution quality and the broker-dealer's processes to ensure that it continues to meet its best execution obligations for our clients. Several judgmental factors are utilized by the Firm in analyzing overall trade execution quality.

Item 13 – Review of Accounts

When using our Advisory Services offered through Third-Party Money Managers (TPMMs), your Intervest Advisor Representative will monitor your account on an ongoing basis and the TPMM will send you quarterly reports. Your Advisor Representative will contact you to arrange a review of your account and the TPMM reports no less than annually.

For Individually Managed Accounts, your Intervest Advisor Representative will monitor your account on an ongoing basis and the custodian broker/dealer will send you quarterly reports. At least annually, your Intervest Advisor Representative will contact you to arrange a review of your Individually Managed Account.

Since Intervest does not have custody of client funds, reports and statements are prepared by the TPMM or custodian broker/dealer, at least quarterly. These written reports contain detailed information on account values, account holdings, asset class positions, and performance.

When you engage Intervest for Financial Planning Services, a principal of Intervest will review your financial plan at or before the time the plan is presented. The Intervest Advisor Representative will present the plan to you, including any proposed reallocation of assets, recommendations for plan implementation, and the

expected results. Annual plan reviews are offered to track the progress of plan implementation and to incorporate any financial changes into the financial plan.

Item 14 – Client Referrals and Other Compensation

When providing advisory services in conjunction with Third-Party Money Managers (TPMMs), Intervest will receive compensation based on solicitor agreements with selected TPMMs who sponsor specialty investment programs. Under many of these agreements, Intervest receives a portion of the total fees charged by the TPMM based on net assets under management. In some cases, the TPMM charges a set fee and Intervest charges an additional fee as a percentage of assets under management. In all arrangements with TPMMs, the relationship and the fee to the TPMM, Intervest and the Advisor Representative are fully disclosed to you on the Investment Advisory Agreement.

Intervest and/or our Advisor Representatives may receive compensation from TPMMs or other product sponsors that creates a conflict of interest. This compensation may include sales-based marketing bonuses, reimbursements for conferences, training, client support tools, educational meetings, training events, industry conferences and entertainment for our Advisor Representatives and/or clients, as permitted by industry rules. The conflict of interest exists in that this compensation provides your Advisor Representative with an incentive to recommend one TPMM versus another TPMM or one product versus another product. You do not pay more, however, to purchase TPMM products through us than you would pay to purchase the same TPMM products elsewhere.

To mitigate this conflict of interest, Intervest reviews our accounts to ensure that the advisory services and product sales being recommended are consistent with your stated goals and objectives. Another way that Intervest addresses the conflict is that sales-based marketing bonuses are not passed on directly to Advisor Representatives, so they do not directly affect an Advisor Representative's product selection.

Item 15 – Custody

It is Intervest's policy to arrange for the safekeeping of your assets with a broker-dealer or bank or other custodial platform. Intervest does not have custody of client assets. Intervest does not directly or indirectly hold your funds or securities, does not have any authority to possess them, and does not have access to your funds or assets, except solely for the purpose of deduction of investment advisory fees.

Typically, you will receive periodic activity reports and an annual account statement from the broker/dealer, bank or other qualified custodian that holds and maintains your investment assets. Intervest urges you to carefully review such statements and compare such official custodial records to any unofficial account statements that your Advisor Representative may provide.

Item 16 – Investment Discretion

Intervest offers accounts that give us non-discretionary authority, meaning accounts where we give you advice and you make the ultimate decision on what investments to buy and sell.

Certain Third-Party Money Managers (TPMMs) that Intervest recommends exercise discretionary authority to manage securities accounts on your behalf. These arrangements will be disclosed to you in the TPMM's Form ADV Part 2A Brochure.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Intervest does not have any authority to and does not vote proxies on your behalf. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. Your Advisor Representative may provide advice to you regarding your voting of proxies.

Item 18 – Financial Information

Intervest has no financial condition that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.