

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

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Name of Investment Adviser: Investment Research & Advisory Group, Inc. dba IRA Group, Inc.						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	1180 W. Peachtree St., St. 2475	Atlanta	GA	30309	404 - 760 - 3730	

**This part of FORM ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any government authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.

Applicant: Investment Research & Advisory  
Group, Inc. dba IRA Group, Inc.

SEC File Number:  
801-

Date:  
7/21/10

**1. A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

**Applicant:**

- |                                     |   |             |
|-------------------------------------|---|-------------|
| <input type="checkbox"/>            | (1) Provides investment supervisory services .....  | _____ %     |
| <input type="checkbox"/>            | (2) Manages investment advisory accounts not involving investment supervisory services.....   | _____ %     |
| <input checked="" type="checkbox"/> | (3) Furnishes investment advice through consultations not included in either service described above...   | <u>70</u> % |
| <input type="checkbox"/>            | (4) Issues periodicals about securities by subscription .....   | _____ %     |
| <input type="checkbox"/>            | (5) Issues special reports about securities not included in any service described above.....  | _____ %     |
| <input type="checkbox"/>            | (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices<br>which clients may use to evaluate securities..... | _____ %     |
| <input checked="" type="checkbox"/> | (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities...  | <u>30</u> % |
| <input type="checkbox"/>            | (8) Provides a timing service .....   | _____ %     |
| <input type="checkbox"/>            | (9) Furnishes advice about securities in any manner not described above.....  | _____ %     |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- B. Does applicant call any of the services it checked above financial planning or some similar term? . . . . .
- |                                     |                          |
|-------------------------------------|--------------------------|
| Yes                                 | No                       |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |

C. Applicant offers investment advisory services for: (check all that apply)

- |                                     |  |                          |                       |
|-------------------------------------|--|--------------------------|-----------------------|
| <input type="checkbox"/>            | (1) A percentage of assets under management      | <input type="checkbox"/> | (4) Subscription fees |
| <input checked="" type="checkbox"/> | (2) Hourly charges                               | <input type="checkbox"/> | (5) Commissions       |
| <input checked="" type="checkbox"/> | (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> | (6) Other             |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |                                     |                                     |                                     |  |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | A. Individuals                      | <input checked="" type="checkbox"/> | E. Trusts, estates, or charitable organizations                    |
| <input type="checkbox"/>            | B. Banks or thrift institutions     | <input checked="" type="checkbox"/> | F. Corporations or business entities other than those listed above |
| <input type="checkbox"/>            | C. Investment companies             | <input type="checkbox"/>            | G. Other (describe on Schedule F)                                  |
| <input checked="" type="checkbox"/> | D. Pension and profit sharing plans |                                     |  |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)**

**FORM ADV**  
**Part II - Page 3**

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**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities                                       | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                             | <input type="checkbox"/> I. Options contracts on:                          |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter                     | <input type="checkbox"/> (1) securities                                    |
| <input type="checkbox"/> (3) Foreign issuers   | <input type="checkbox"/> (2) commodities                                   |
| <input type="checkbox"/> B. Warrants   | <input type="checkbox"/> J. Futures contracts on:                          |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles                                     |
| <input type="checkbox"/> D. Commercial paper   | <input type="checkbox"/> (2) intangibles                                   |
| <input checked="" type="checkbox"/> E. Certificates of deposit                                 | <input type="checkbox"/> K. Interests in partnerships investing in:        |
| <input checked="" type="checkbox"/> F. Municipal securities                                    | <input checked="" type="checkbox"/> (1) real estate                        |
| <input type="checkbox"/> G. Investment company securities:                                     | <input type="checkbox"/> (2) oil and gas interests                         |
| <input checked="" type="checkbox"/> (1) variable life insurance                                | <input checked="" type="checkbox"/> (3) other (explain on Schedule F)      |
| <input checked="" type="checkbox"/> (2) variable annuities                                     | <input type="checkbox"/> L. Other (explain on Schedule F)                  |
| <input checked="" type="checkbox"/> (3) mutual fund shares                                     |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |  |

B. The main sources of information applicant uses include: (check those that apply)

- |   |  |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services   |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities   | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission   |
| (4) <input checked="" type="checkbox"/> Corporate rating services             | (7) <input checked="" type="checkbox"/> Company press releases                         |
|   | (8) <input type="checkbox"/> Other (explain on Schedule F)                             |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |   |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                            | (7) <input type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input type="checkbox"/> Short sales   |   |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)**

**FORM ADV**  
**Part II - Page 4**

Applicant: Investment Research & Advisory  
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**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... Yes No  
☒ ☐

(If yes, please describe these standards on Schedule F)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- ☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)**

**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No  
☐ ☒

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Reviews are conducted on a quarterly basis.

Reviewers:

Douglas B. Leeson, Principal

Daniel R. Joyce, Managing Director

Judith Ann Jolley, Managing Director

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Quarterly reviews include a detailed analysis of performance as compared to market averages and pre-specified performance benchmarks.

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
|  | Yes                      | No                                  |
| (1) securities to be bought or sold? .....           | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) amount of securities to be bought or sold? ..... | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (3) broker or dealer to be used? .....               | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) commission rates paid? .....                     | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ..... ☒ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |   |                                     |                                     |
|---|-------------------------------------|-------------------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes                                 | No                                  |
|   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes                                 | No                                  |
|   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?..... ☐ Yes ☒ No

**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Investment Research & Advisory  
Group, Inc. dba IRA Group, Inc.

SEC File Number:  
801-

Date:  
7/21/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>IRA Group, Inc.</b>		IRS Empl. Ident. No.: <b>58-1989031</b>
Item of Form (identify)	Answer	
1A	<p>Applicant will offer one or more of the following services to clients for the fees stated below:</p> <ol style="list-style-type: none"> <li>1. Assistance to organizations in the design, of group retirement plans and recommendations as to the allocation of present financial assets among various investment alternatives.</li> <li>2. Assistance to organizations in developing a formal investment policy relating to group retirement plans.</li> <li>3. Assistance to organizations in the investment performance of group retirement plans.</li> <li>4. Assistance with employer communications associated with group retirement plans.</li> <li>5. Financial planning services to individuals encompassing retirement savings, education savings, life insurance, disability insurance and estate planning.</li> </ol> <p>Fees for the services listed above shall be structured as an hourly rate, flat fee or per project rate. Each client shall determine the remuneration method most suitable to their needs.</p> <p>Our minimum hourly rate is \$250/hr. Our minimum annual fixed fee is \$10,000.</p> <p>Fees will be billed on a monthly or quarterly basis depending on the service rendered and the client and/or applicant is free to terminate the contract at any time. In the event an agreement is terminated by client after inception but prior to the completion of the first year of service, IRA Group will present a bill for the remaining first year's fees. If the termination is initiated by either party after the first year, for any work-in progress it is understood that IRA Group reserves the right to bill client for services rendered up to, and including the termination date at an hourly rate previously agreed upon by client.</p> <p>If the client pursues a strategy that involves investments or contracts with commissions, 12b-1 fees or finders' fees inherent in the pricing structure(s), the client may elect to offset the billable fees by the commission amount(s) payable.</p> <p>The recommendations and/or analysis provided to clients will be valid as of the date provided and will not be valid for any period beyond that date.</p> <p>Associated persons of Applicant are available to address institutions and individuals on the subject of financial planning. Applicant and its licensed employees may also prepare articles for publication in community newspapers concerning, investment management, the economy, risk management, pre-retirement and retirement planning and tax planning.</p> <p>Associated persons of Applicant, who are appropriately licensed, may receive commissions upon the sale of life insurance or annuity products recommended to clients. These commissions may range from one hundredth (1/100) of a percent to one-hundred (100) percent of first year premiums with declining schedules in second and subsequent years.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Investment Research & Advisory  
Group, Inc. dba IRA Group, Inc.

SEC File Number:  
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Date:  
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>IRA Group, Inc.</b>		IRS Empl. Ident. No.: <b>58-1989031</b>
Item of Form (identify)	Answer	
1A (cont.)	Applicant provides investment advisory services to institutional retirement plans and imposes a minimum annual fee requirement of \$10,000 for such services. The minimum fee may be waived in certain instances by taking into account additional investment advisory relationships that may exist between the client and the Applicant.	
3K (3)	Associated person of Applicant also may recommend to its financial planning clients that they invest in other partnerships, such as alternative energy, equipment leasing, real estate or research & development.	
5	A college education is required. Experience in the individual or institutional investment market place is preferred. Effective client servicing skills are necessary.	
6	<p>DOUGLAS BRIAN LEESON: Born 1964. Miami University, Oxford, Ohio 1982-1986; Principal IRA Group, Inc., April 1992 - present; Registered Principal, LPL Financial, April 1992 - present; Account Manager, Aetna Capital Management, Inc., May 1989 - April 1992; Employee Benefits Representative, Aetna Life Insurance Company, June 1986 - May 1989.</p> <p>DANIEL R. JOYCE: Born 1947. Franklin and Marshall College, Lancaster, Pennsylvania 1965 - 1969; Managing Director, IRA Group, Inc., January 2001 - present; Registered Representative, LPL Financial, March 2001 - present, Regional Vice President, Chicago Trust Company, May 1983 - January 2001.</p> <p>JUDITH ANN JOLLEY: Born 1960. Iowa State University, Ames, Iowa 1979 - 1983; Managing Director, IRA Group, Inc., October 2009 - present; Registered Representative, LPL Financial, March 2010 - present; Vice President and Supervisory Principal, Fidelity Investments 1996 - 2008; Relationship Manager and Registered Representative, Fidelity Investments 1994 - 1996; Product Consultant and Registered Representative, John Hancock Mutual Life Insurance Company 1993 - 1994; Account Administrator &amp; New Business Consultant, John Hancock 1990 - 1993; Pension Administrator, Berkshire Life Insurance Company 1984 - 1990.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)



**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Investment Research & Advisory  
Group, Inc. dba IRA Group, Inc.

SEC File Number:  
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Date:  
7/21/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>IRA Group, Inc.</b>		IRS Empl. Ident. No.: <b>58-1989031</b>
Item of Form (identify)	Answer	
7A, B & C	<p>The principal business of the firm will be that of a retirement plan consulting and financial planning firm. In addition to rendering financial advisory services, associated persons of Applicant, at client's request and with prior disclosure, may act as registered representative under an unaffiliated registered broker/dealer in buying and selling securities and will receive commissions on the sale of insurance policies and annuities to clients. In all such cases, full disclosure will be made to client in the event of the transaction.</p> <p>Douglas B. Leeson is a:</p> <p>1) Registered Representative with LPL Financial. In such a capacity, he may offer securities and receive normal and customary commissions as a result of securities transactions. This could present a conflict of interest to the extent he recommends that a client invest in a security which results in a commission being paid to him. He spends &lt;1% of time on these activities.</p> <p>2) Licensed insurance agent through numerous insurance companies. In such a capacity, he may offer insurance products and receive normal and customary commissions as a result of such a purchase. This could present a conflict of interest to the extent that he recommends the purchase of an insurance product which results in a commission being paid to him as an insurance agent. He spends &lt;1% of time on these activities.</p> <p>3) Investment Advisor Representative, ("IAR"), with LPL Financial. In such a capacity, the IAR may offer advisory accounts through LPL Financial, the details of which are fully described in LPL Financial's Form ADV or relevant schedules. This could present a conflict of interest to the extent that he recommends that a client open an account in which compensation is received as an IAR with LPL Financial. He spends 35% of time on these activities.</p> <p>Judith Ann Jolley is a:</p> <p>1) Registered Representative with LPL Financial. In such a capacity, she may offer securities and receive normal and customary commissions as a result of securities transactions. This could present a conflict of interest to the extent that she recommends that a client invest in a security which results in a commission being paid to her. She spends &lt;1% of time on these activities.</p> <p>2) Investment Advisor Representative, ("IAR"), with LPL Financial. In such a capacity, the IAR may offer advisory accounts through LPL Financial, the details of which are fully described in LPL Financial's Form ADV or relevant schedules. This could present a conflict of interest to the extent that she recommends that a client open an account in which compensation is received as an IAR with LPL Financial. She spends &lt;1% of time on these activities.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Investment Research & Advisory  
Group, Inc. dba IRA Group, Inc.

SEC File Number:  
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Date:  
7/21/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:  
IRA Group, Inc.

IRS Empl. Ident. No.:  
58-1989031

Item of Form (identify)	Answer
7A, B & C (cont.)	<p>Daniel R. Joyce is a:</p> <p>1) Registered Representative with LPL Financial. In such a capacity, he may offer securities and receive normal and customary commissions as a result of securities transactions. This could present a conflict of interest to the extent that he recommends that a client invest in a security which results in a commission being paid to her. He spends &lt;1% of time on these activities.</p> <p>2) Investment Advisor Representative, ("IAR"), with LPL Financial. In such a capacity, the IAR may offer advisory accounts through LPL Financial, the details of which are fully described in LPL Financial's Form ADV or relevant schedules. This could present a conflict of interest to the extent that he recommends that a client open an account in which compensation is received as an IAR with LPL Financial. He spends &lt;1% of time on these activities.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Investment Research & Advisory  
Group, Inc. dba IRA Group, Inc.

SEC File Number:  
801-

Date:  
7/21/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>IRA Group, Inc.</b>		IRS Empl. Ident. No.: <b>58-1989031</b>
Item of Form (identify)	Answer	
9	<p>IRA Group employees must abide by and act in accordance with all applicable Federal and State regulations. Individuals who fail to comply with the firm's policies and procedures may be subject to sanctions and disciplinary action, including termination of employment.</p> <p>The Applicant expressly prohibits any employee from placing his or her interests ahead of its advisory clients. All employees' reports of personal securities transactions are reviewed for compliance with the Applicant's Code of Ethics. We will conduct every aspect of our business in a fair, ethical and lawful manner. We will maintain a climate that encourages every associated person of Applicant to be honest and fair in the conduct of his or her duties.</p> <p>Our advisory business requires us to obtain financial and other personal information about our clients. We have an obligation to respect their rights of privacy and promise to:</p> <p>Only request and use information that is related to our business needs.</p> <p>Limit use and discussion of information obtained on the job to normal business activities.</p> <p>Restrict access to records to those with proper authorization and legitimate business needs.</p> <p>A copy of our code of ethics will be provided to any current or prospective client upon request.</p>	
9B	Associated persons of Applicant, as broker or agent, may effect securities transactions for compensation upon request by clients. They will disclose all remuneration received on such transactions.	
9E	Associated persons of Applicant may make purchases or sales of securities which have been recommended to clients. Associated persons of Applicant will not sell their position at a time they are recommending a buy, and likewise, will not buy any securities that they are recommending to their clients to sell except in emergency situations, such persons may sell mutual funds or limited partnership interests after approval by Applicant's Compliance Officer.	
12B & 13A	<p>Associated person of Applicant may suggest that their clients implement recommendations set forth in a financial plan through LPL Financial in his or her capacity as a registered representative or independent licensed insurance agent. If the client chooses to do so, this could present a conflict of interest if the associated person of Applicant received normal and customary commissions as a registered representative or licensed insurance agent resulting from any securities or insurance transactions.</p> <p>Clients are advised that they are under no obligation to implement the plan or its recommendations through the Associated person of Applicant in his or her capacity as a registered representative or licensed insurance agent. All potential conflicts of interest relating to compensation are always fully disclosed.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)