

**Firm Brochure
for
Private Investment Advisory Clients**
(Part 2A of Form ADV)

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d/b/a IRA Group
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This brochure provides information about the qualifications and business practices of Investment Research & Advisory Group, Inc. If you have any questions about the contents of this brochure, please contact us at: 404.760.3730 or by email at: dleeson@iragroup.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 Investment Research & Advisory Group, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

March 2017

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Material Changes

This Form ADV Part 2, also known as our "**Brochure**," has 18 separate disclosure items that we must address, each of which must be presented in the order set forth in this Brochure. A current, updated Form ADV Part 2A will be available to our existing and prospective clients 24 hours a day through the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov or by contacting us by telephone at 404.760.3730 or by email at fsmith@iragroup.com. Additionally, we will provide an updated Brochure or summary of material changes annually to our continuing clients. In the future, this Brochure section will summarize any material changes from the disclosures in the Brochure previously delivered to you.

This Brochure has been tailored for our Firm's private investment advisory clients, with a separate Brochure for our Firm's institutional advisory clients. The contents of this Brochure do not reflect any material changes from the prior version of our last Brochure dated August 2016.

Commented [FS1]: This brochure has been substantially revised in order to set forth information applicable only to the Firm's advisory clients. Due to the recent changes surrounding the custody rule, IRA Group has now deemed custody over all 297 advisory accounts under the firm's management.

ILG: I don't know that this is material as it is a change in the Rule.

Advisory Business

Firm Description

Investment Research & Advisory Group, Inc. (“**IRA Group**” or the “**firm**”) was founded in 1992. IRA Group serves clients throughout the United States in two primary businesses: Institutional Advisory and Private Client Services. This Private Client Services Brochure describes the firm's private investment advisory services clients. The firm's Investment Advisory Services provided to individuals, foundations, endowments and pension plans using our institutional advisory discipline are described in a separate brochure.

IRA Group is strictly a fee-only investment advisory firm. The firm is not affiliated with entities that sell financial products or securities and no forms of commission or finder's fee are accepted. IRA Group does not act as a custodian of client assets. The client always maintains asset control.

The investment services include a written evaluation of each client's initial situation, often in the form of a cash flow projection and net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

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

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

Principal Owners

Douglas B. Leeson is the sole stockholder of the firm.

Types of Advisory Services

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

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying IRA Group in writing and paying the rate for the time spent on the private client engagement prior to notification of termination.

IRA Group may terminate any of the aforementioned agreements at any time by notifying the client in writing.

Assets Under Management and Assets Under Advisement

As of December 31, 2016, IRA Group managed approximately \$164 million of net assets on a discretionary basis. IRA Group manages \$5.2 million on a non-discretionary basis for its Private Client Services clients. As of the same date, the Institutional Advisory Services clients advised by the firm had approximately \$6.9 billion of assets.

Fees and Compensation

Description

The fees for IRA Group's private client services are assessed as a percentage of assets under management.

<u>Investment Account</u>	<u>Amount Managed</u>	<u>Annualized Rate</u>
on the first	\$ 2,500,000	0.90%
on the next	\$ 2,500,000	0.75%
on the next	\$ 5,000,000	0.50%
on the next	\$ 10,000,000	0.45%
Above	\$ 20,000,000	0.40%

Fees are negotiable.

Fee Billing

Private client fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are deducted from a designated client account to facilitate billing unless the client requests to pay via check. The client must consent in advance to direct debiting of their investment account.

Other Fees

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

IRA Group, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (*e.g.*, historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

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

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

Account Minimums

The minimum account size for private client engagements is \$1 million.

IRA Group has the discretion to waive the minimum account size for private clients. Other exceptions will apply to employees of IRA Group and their relatives, or relatives of existing clients.

Past Due Accounts and Termination of Agreement

IRA Group reserves the right to stop work on any account that is more than 90 days overdue. In

addition, IRA Group reserves the right to terminate any private client engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in IRA Group's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will not be refunded.

Performance-Based Fees

Sharing of Capital Gains

IRA Group does not accept or assess any performance-based fees.

Methods of Analysis, Investment Strategies and Risk of Loss

Description

IRA Group employs an investment philosophy based on the premise that asset allocation is the primary determinant of overall portfolio risk and return. We consider representation in the following asset classes for client portfolios:

- Large cap equity
- Mid cap equity
- Small cap equity
- International equity
- High grade fixed income
- High yield fixed income
- International fixed income
- Cash equivalents
- Alternatives

Upon completion of a client risk assessment which contemplates specific liquidity needs, income requirements, return objectives, performance volatility considerations, and securities restrictions, target weightings are established for each asset class represented in a portfolio. A client may choose to exclude certain asset classes or securities in their portfolio based on specific needs and circumstances. After identification of eligible asset classes and target portfolio weightings, IRA Group establishes allowable ranges for strategic and/or tactical overweighting or underweighting of a specific asset class based on prevailing economic and financial market conditions. Strategic and/or tactical portfolio shifts are primarily predicated on IRA Group's price-to-fair value methodology which attempts to opportunistically benefit from periods of overvaluation or undervaluation in the equity markets. Generally, during periods of perceived equity market overvaluation, the equity allocation of a client portfolio may be reduced below the target weighting but within the allowable range. In periods of equity market undervaluation, the equity allocation may be increased above the target weighting but within the allowable range.

In managing portfolios, IRA Group only considers publicly-traded securities to facilitate client liquidity needs. Additionally, we believe that this emphasis on publicly-traded securities results

in consistency of research data and performance analytics. Eligible securities for inclusion in client portfolios include:

- Open-end mutual funds
- Exchange-traded funds (ETFs)
- Individual stocks
- Individual bonds
- Options

Our proprietary analytical process for evaluating securities encompasses multiple layers of data evaluation and manager due diligence. This process results in the identification of investments that are eligible for inclusion in client portfolios. These investments comprise the IRA Group Focus List. Individual investments represented on the Focus List change over time based on performance, underlying fundamentals, economic and market conditions, and certain non-financial criteria. In most circumstances, an investment that is removed from the Focus List is also removed from client portfolios. At any point in time, a client may own all or some of the investments represented on the Focus List. Additionally, under certain circumstances, a client portfolio may include investments that are not represented on the Focus List. This may be attributable to certain tax management strategies or a specific client request.

Methods of Analysis

Security analysis methods may typically include fundamental and technical analysis.

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

Other sources of information that IRA Group may use include Morningstar mutual fund and stock information, eMoney Advisor and the World Wide Web.

Investment Strategies

The primary investment strategy used is strategic asset allocation utilizing a core and satellite approach. This means that we use mutual funds and exchange-traded funds as the core investments, and then add individual stocks and bonds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies may include long-term purchases, short-term purchases, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

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

or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

IRA Group's principal business is that of a retirement plan consulting and investment advisory firm.

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

Code of Ethics

The employees of IRA Group have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

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

Personal Trading

The Chief Compliance Officer of IRA Group is Faith Smith. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades, exchange-traded fund trades, or individual stocks the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

IRA Group does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. IRA Group recommends custodians based on the proven integrity and financial responsibility of the firm and

the best pricing for services.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

The Custodian and Brokers We Use

IRA Group does maintain custody of your assets on which we advise due to the authority you have given us to withdraw assets from your account. Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab.

Commented [FS2]: Should I say: IRA Group does maintain custody of your assets on which we advise due to the authority you have given us to withdraw assets from your account.

ILG: Yes

How We Select Brokers/Custodians to Recommend

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including these:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- Reputation, financial strength, and stability of the provider
- Their prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below

Your Custody and Brokerage Costs

For our clients’ accounts it maintains, Schwab generally does not charge you separately for services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commissions, Schwab can charge you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold

Commented [FS3]: Should I remove the word custody from this sentence?

ILG: Yes

are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide our clients and us 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. Here is a more detailed description of Schwab's support services:

Services That Benefit You.

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 you and your account.

Services That May Not Directly Benefit You.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. 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 some 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; and
- 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;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- 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.

Review of Accounts

Periodic Reviews

Account reviews are performed no less than on an annual basis by advisors:

Douglas B. Leeson, Principal
John R. Frazer, Managing Director

Account reviews are performed more frequently when market conditions dictate.

Review Triggers

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

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. The written updates may include a performance summary at the portfolio and individual position level and a summary of objectives and progress towards meeting those objectives.

Client Referrals and Other Compensation

Incoming Referrals

IRA Group has been fortunate to receive many client referrals over the years. The referrals came from current clients, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

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

Custody

Custody

IRA Group is deemed to have custody over all managed Advisory Client accounts. IRA Group has been granted the authority to process request for money movement and trades per standing authorizations by Advisory Clients. Assets are not held directly with IRA Group rather with Schwab which is a qualified custodian.

Commented [FS4]: IRA Group is deemed to have custody over all managed Advisory Client accounts. IRA Group has been granted the authority to process request for money movement and trades per standing authorizations by Advisory Clients. Assets are not held directly with IRA Group rather with Schwab which is a qualified custodian.
Please provide any suggestions to the above statement.

ILG: see my edit above "request for" ... money movement....

Account Statements

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

Performance Reports

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

Investment Discretion

Discretionary Authority for Trading

Private Advisory Clients

IRA Group may or may not have investment authority on behalf of its Private Advisory Clients. Each client may elect to have IRA Group provides recommendations that can be implemented directly by the client with their designated custodian.

Commented [FS5]: We have trading discretion on all managed accounts, clients do not authorize their own trades.

IRA Group does have investment authority on behalf of its Private Advisory Clients that have managed accounts. Each client has elected to have IRA Group provide recommendations and to implement trades with their designated custodian.

IRA Group does not have investment authority on behalf of its Private Advisory Clients with unmanaged accounts. Each client may elect to have IRA Group provides recommendations that can be implemented directly by the client with their designated custodian.

ILG: The reason for "IRA Group may or may not have investment authority".... Is allow for either option.

Voting Client Securities

Proxy Votes

IRA Group does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, IRA Group will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Financial Information

Financial Condition

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

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

Business Continuity Plan

General

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

Disasters

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

Alternate Offices

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

Loss of Key Personnel

In the event of Doug Leeson's disability or death, the responsibility of the management of his advisory clients will be distributed among the active managing directors.

Information Security Program

Information Security

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

Privacy Notice

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

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

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

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

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

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

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

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

IRA Group requires that advisors in its employ have a bachelor's degree. We encourage further coursework demonstrating knowledge of evaluating investments and their performance, investment policies, the different types of retirement plans and related issues, legal and regulatory guidelines, security regulations and fiduciary responsibilities. Additionally, advisors must have work experience that demonstrates their aptitude for private advisory consulting and investment services.

DOUGLAS B. LEESON, PRINCIPAL

Educational Background:

- Date of birth: April 19, 1964
- Institutions: Miami University of Ohio – 1986

Business Experience:

- April 1992 – Present
 - Principal, Investment Research & Advisory Group, Inc.
 - Registered Principal, LPL Financial
- May 1989 – April 1992
 - Account Manager, Aetna Capital Management, Inc.
- June 1986 – May 1989
 - Employee Benefits Representative, Aetna Life Insurance Company

Disciplinary Information

Douglas B. Leeson has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

Douglas B. Leeson is supervised by Faith David Smith, Chief Compliance Officer. She reviews Douglas B. Leeson's work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. She also reviews Doug Leeson's activities through our client relationship management system.

Faith Davis Smith 404.760.3734, fsmith@iragroup.com

JOHN R. FRAZER

Educational Background:

- Date of birth: August 20, 1964
- Institutions: The Citadel - 1986

Business Experience:

- April 2016 – Present
 - o Managing Director, Investment Research & Advisory Group, Inc.
- January 2014 – April 2016
 - o Managing Director, Genspring Family Offices
- May 2009 – January 2014
 - o Executive Vice President, SunTrust Private Wealth Management
- May 2007 – May 2009
 - o President, SunTrust Bank, Memphis Region
- October 2004 – May 2007
 - o Executive Vice President, SunTrust Bank, Memphis Region
- May 2000 – October 2004
 - o Senior Vice President, SunTrust Private Wealth Management
- October 1989 – May 2000
 - o SunTrust Bank
- May 1986 – October 1989
 - o Airborne Ranger Infantry Officer, United States Army

Disciplinary Information

John R. Frazer has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

John R. Frazer supervised by Douglas B. Leeson, Principal. He reviews John Frazer's work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. He also reviews John Frazer's activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com

DANIEL R. JOYCE

Educational Background:

- Date of birth: June 5, 1947
- Institutions: Franklin and Marshall College – 1969

Business Experience:

- January 2001 – Present
 - o Managing Director, Investment Research & Advisory Group, Inc.
- March 2001 – Present
 - o Registered Representative, LPL Financial
- May 1983 – January 2001

- o Regional Vice President, Chicago Trust Company

Disciplinary Information

Daniel R. Joyce has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

Daniel R. Joyce is supervised by Doug Leeson, Principal. He reviews Dan Joyce's work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. He also reviews Dan Joyce's activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com

SERE E. AUSTIN

Educational Background:

- Date of birth: May 24, 1961
- Institutions: Minnesota State University – 1983

Business Experience:

- January 2011 – Present
 - o Managing Director, Investment Research & Advisory Group, Inc.
- March 2011 - Present
 - o Registered Representative, LPL Financial
- 2008 - 2010
 - o Senior Consultant, Southeastern Advisory Services, Inc.
- 2000 - 2008
 - o Investment Consulting Practice Leader (VIAS), Veritas Consulting Group, LLC
- 1996 - 2000
 - o Vice President, Financial Services Division, United Bank
- 1993 - 1996
 - o Vice President, Client Service Officer, Bank South/Nations Bank
- 1988 - 1993
 - o Consultant, Marketing and Client Services, Benefit Services Corporation
- 1987 - 1988
 - o Trust Funds Administrator, C&S Trust Company
- 1983 - 1987
 - o Investment Performance Measurement Administrator, Norwest Bank, NA

Disciplinary Information

Sere E. Austin has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

Sere E. Austin is supervised by Douglas B. Leeson, Principal. He reviews Sere Austin's work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. He also reviews Sere Austin's activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com

ASHLI B. SMITH

Educational Background:

- Date of birth: December 7, 1973
- Institutions: University of Kentucky – 1995

Business Experience:

- January 2016 – Present
 - o Managing Director, Investment Research & Advisory Group, Inc.
- September 2010 – November 2015
 - o Vice President, J.P. Morgan Asset Management
- May 2009 – September 2010
 - o Vice President Operations, Index Publications LLC
- June 1995 – February 2009
 - o Vice President, Fidelity Investments

Disciplinary Information

Ashli B. Smith has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

Ashli B. Smith is supervised by Douglas B. Leeson, Principal. He reviews Ashli Smith's work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. He also reviews Ashli Smith's activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com

WILLIAM G. TALLEY**Educational Background:**

- Date of birth: February 16, 1962
- Institutions: Rollins College – 2002 Auburn University – 1985

Business Experience:

- October 2014 – Present
 - Managing Director, Investment Research & Advisory Group, Inc.
- November 2014 - Present
 - Registered Representative, LPL Financial
- 2008 – 2011
 - Registered Representative, The Vanguard Group
- 2005 - 2008
 - Senior Investment Consultant, The Newport Group, Inc.
- 2003 - 2005
 - Investment Advisor Representative, Sentinel Fiduciary Services, Inc.
- 2002 - 2003
 - Unemployed
- 2001 - 2002
 - Public Pension Plan Consultant, Burgess Chambers & Assoc., Inc.
- 2000 – 2001
 - Unemployed
- 1997 - 2000
 - Investment Adviser, Dean Witter Reynolds Inc.
- 1996 - 1997
 - Unemployed/Occasional Consulting
- 1992 - 1996
 - V.P. Sales & General Operation, Talley Wood Products
- 1987 - 1992
 - Sales Manager, Growers Container Coop, Inc.

Disciplinary Information

William G. Talley has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

William G. Talley is supervised by Douglas B. Leeson, Principal. He reviews William Talley's work through attendance at periodic client meetings, frequent office interactions as well as remote

interactions. He also reviews William Talley's activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com

JUDITH ANN JOLLEY

Educational Background:

- Date of birth: December 8, 1960
- Institutions: Iowa State University - 1983

Business Experience:

- October 2009 – January 2014, January 2017 - current
 - Managing Director, Investment Research & Advisory Group, Inc.
- March 2010 – January 2014
 - Registered Representative, LPL Financial
- 1996 - 2008
 - Vice President and Supervisory Principal, Fidelity Investments
- 1994 – 1996
 - Relationship Manager and Registered Representative, Fidelity Investments
- 1993 – 1994
 - Product Consultant and Registered Representative, John Hancock Mutual Life Insurance Company
- 1990 – 1993
 - Account Administrator and New Business Consultant, John Hancock Mutual Life Insurance Company
- 1984 - 1990
 - Pension Administrator, Berkshire Life Insurance Company

Disciplinary Information: N/A

Other Business Activities: Owner, J Squared of North Georgia LLC, dba Cabin Coffee Co. of Blairsville

Additional Compensation: None

Supervision:

Judith Ann Jolley is supervised by Douglas B. Leeson, Principal. He reviews Judy Jolley's work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. He also reviews Judy Jolley's activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com

PATRICK T. HARRIS**Educational Background:**

- Date of birth: August 29, 1991
- Institutions: Rhodes College – 2014

Business Experience:

- September 2014 – Present
 - o Director: Research & Reporting, Investment Research & Advisory Group, Inc.

Disciplinary Information

Patrick T. Harris has no disciplinary events or actions to disclose

Other Business Activities: None

Additional Compensation: None

Supervision:

Patrick T. Harris is supervised by Douglas B. Leeson, Principal. He reviews Patrick T. Harris' work through attendance at periodic client meetings, frequent office interactions as well as remote interactions. He also reviews Patrick T. Harris' activities through our client relationship management system.

Douglas B. Leeson: 404.760.3737, dleeson@iragroup.com