



**NFP Retirement, Inc.**  
**dba 401(k) Advisers**  
**dba 403(b) Advisers**

**Registered Investment Adviser**

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**October 16, 2017**

**FORM ADV BROCHURE  
PART 2A**

(Item I)

**This brochure provides information about the qualifications and business practices of NFP Retirement a registered Investment Adviser under the name NFP Retirement, Inc. Any questions about the contents of this brochure please contact us at 949.460.9898. 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 NFP Retirement is also available on the SEC's website at [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov). The IARD/CRD number for NFP Retirement is 121254.**

**Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## Item 2 - Summary of Material Changes

In this “Summary of Material Changes” the Adviser discusses only the material changes since the last annual update of this brochure in September 2015:

Material changes from the previously filed ADV Part 2 are related to adding/deleting/changing information on certain Investment Adviser Representatives Part 2B.

**Delivery of Amendments to this Brochure.** In the past NFP Retirement has offered or delivered information about the Adviser’s qualifications and business practices to customers on at least an annual basis. The brochure is updated at least annually, in order to ensure that it remains current.

Pursuant to new SEC rules, NFP Retirement will provide each of its customers with a summary of any material changes for subsequent annual updates to brochures by April 30th of each year. The client will be provided with a new Brochure as necessary based on changes or new information, at any time, without charge.

Due to the changes to this brochure, it is suggested that customers review this document, in its entirety, upon receipt. Customers are also encouraged to review this brochure, and any questions they may possess regarding this brochure may be brought to the attention of Joel Shapiro at [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com).

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## Item 4 - Advisory Services

NFP Retirement Inc. is federally registered as an investment adviser and also does business as (“dba”) 401(k) Advisers and 403(b) Advisers (collectively referred to in this brochure as “Adviser” or “NFP”). NFP Retirement Inc. is owned by or under common control with NFP Corp., which also owns, or is under common control with, other registered investment advisers, broker-dealers, insurance agencies and other product and service providers (“NFP Affiliates”). From time to time, we may recommend that you purchase or sell products and services from or through NFP Affiliates and these NFP Affiliates and our firm may receive compensation as a result of such recommendations. A recommendation that you purchase or sell products or services by or through an NFP Affiliate may be deemed to create a conflict of interest since it could result in increased compensation to an NFP Affiliate or our firm. NFP provides comprehensive qualified and non-qualified retirement plan consulting, investment advice and fiduciary due diligence services, employee plan and investment education, asset allocation services, plan service provider proposal and provider research and analysis, and plan design guidance to individuals, qualified and non-qualified retirement plan sponsors, and business entities. The Adviser provides Clients both Investment Advice (non-discretionary) and/or Investment Management (discretionary) Investment Advisory services, based on the scope of the engagement.

### Investment Advice (Plan Level)

The Adviser shall provide research and analysis with regard to investment advice and fiduciary due diligence services for the Client. The Adviser shall also provide research and analysis that covers the investment products of several qualified and non-qualified retirement plan providers. The goal of the investment due diligence process is to establish a logical, technical, and comprehensive process that is consistently employed in the selection and ongoing monitoring of funds for plan sponsors and individuals, accompanied by an investment policy statement (for plan sponsors only), that defines the process utilized to recommend the investments to plan sponsors and individuals.

The Employer (Client of the Adviser), sponsors a qualified (or nonqualified) Retirement Plan for the benefit of its employees. The Plan is a qualified or non-qualified employee benefit plan intended to comply with all applicable federal laws and regulations, including the Internal Revenue Code of 1986, as amended, and the Employee Retirement Income Security Act of 1974 (ERISA), as amended, if applicable. In addition, applicable Plans are intended to comply with ERISA Section 404(c).

The Adviser may employ many different calculations, processes, and screening techniques to arrive at specific recommended individual investments within the array of investments offered by each investment provider that is being analyzed including but not limited to the following:

- Investment analysis by asset class (domestic equity, international equity, income, hybrid/managed accounts), including market capitalization (small, medium, and large), and investment objective (value, blend, and growth orientation);
- Performance relative to other investments in the same asset class;
- Investment performance relative to benchmark performance for the same asset class;
- Percentile ranking of investment performance for the same asset class;
- Style-based analysis to determine the impact of an investment being managed differently than its stated investment objective (which is usually a combination of the stated market capitalization category, and investment objective category);
- Macro screens to eliminate long term under-performing investments, funds with total managed assets of less than the minimum threshold deemed to be adequate by the Adviser;

- Review of upside and downside capture, to estimate upside potential and downside risk of each investment;
- Common objective risk and return statistical measurements, such as Sharpe ratio, standard deviation, alpha, and beta;
- Common statistically relevant manager value measurements such as information ratio and tracking error;
- R-squared, correlation coefficients, and other statistically relevant information;
- Excess return over the given performance benchmark;
- Short and long term historical analysis with any of the above measurements;
- Financial strength, stability, and reputation of the investment provider, and individual investments offered by and through the investment provider;
- Tenure and experience of investment management personnel;
- Investment philosophy, process, and style; and
- Investment fees.

The Adviser shall provide a draft of the statement of Investment Policy for Client's review. In addition, the Adviser will evaluate Client's existing Investment Policy Statement and provide recommendations that are consistent with assisting the Client meet their fiduciary obligations, if applicable, under ERISA Section 404(c).

**Investment Management (Plan Level):**

The Adviser shall be responsible, and maintains discretion, for the selection, mapping, and ongoing monitoring, of investments offered within the Plan. The Adviser hereby accepts co-fiduciary responsibility for such duties. The Client engages the Adviser for management of Plan assets and shall delegate specified authority and discretion to the Adviser for the selection, mapping, and ongoing monitoring (including replacement, as prudent), of investments offered within the plan. However, services provided by the Adviser under this Agreement will not include any services with respect to employer securities or company stock nor is the Adviser a fiduciary in regards to any single security offering or SDBA available in a plan. The Adviser shall be responsible and possess discretion for the selection of investment options used to populate the asset allocation models. The Adviser shall also provide documentation supporting the investment due diligence in a regularly prepared Fiduciary Investment Review report. The Adviser will have an established investment due diligence process that is a logical, technical, and comprehensive process that is consistently employed in the selection, de-selection, and ongoing monitoring of funds for plan sponsors and individuals, accompanied by an investment policy statement, that defines the process utilized to guide decision making in the management of the plan investments offered to plan sponsors and individuals.

The Client sponsors a qualified retirement plan for the benefit of its employees. The Plan is a qualified employee benefit plan intended to comply with all applicable federal laws and regulations, including the Internal Revenue Code of 1986, as amended, and the Employee Retirement Income Security Act of 1974 (ERISA), as amended. In addition, the Plan is intended to comply with ERISA Section 404(c) and all regulations promulgated there under. The Client intends to engage their best efforts to comply with all requirements of ERISA Section 404(c) and the regulations there under.

The Adviser may employ many different calculations, processes, and screening techniques, to arrive at specific recommended individual investments within the array of investments offered by each investment provider that is being analyzed.

The Adviser shall provide the Client with the Investment Policy Statement for Client's review and inform the Client when, and if, there are any changes thereto. In addition, the Adviser will provide its services with the objective of meeting the Adviser's and Client's fiduciary obligations under ERISA Section 404(a) and with the intent of meeting the requirements of ERISA Section 404(c).

#### Employee Plan and Investment Education

The Adviser may provide group employee enrollment, re-enrollment, and investment education support. The goal of this process is to help employees make educated and informed choices about the plan and investment allocation under the investment education guidelines set forth by the U.S. Department of Labor. Meetings are offered on a(n) annual, semi-annual, quarterly, or as requested basis. The scope of the meetings will be group and/or individual, and will be conducted on-site and/or as data conferencing.

#### Employee (Participant) Investment Advice and/or Asset Allocation Models

The Adviser shall create, monitor, adjust (when prudent), and rebalance asset allocation models ("Models") for plan sponsor use as an investment tool provided to participants for use in assisting Plan Participants in making asset allocation decisions for their investment portfolios (i.e. equity and fixed income). Whether the Models are used as stand-alone tools or used in conjunction with the delivery of investment advice, they are designed to have different investment objectives based on risk level. To meet these varying investment needs, participants and beneficiaries will be able to elect to direct their account balances among a range of investment options to construct diversified portfolios that reasonably span the risk/return spectrum.

The goal of the investment advice process is to assist Plan Participants in finding the asset mix which is most likely to meet their investment objectives within acceptable risk parameters. Asset class sub-types can include domestic large cap value equity, domestic large cap growth equity, domestic mid-cap value equity, domestic mid-cap growth equity, domestic small cap value equity, domestic small cap growth equity, international equity, core fixed income, short term fixed income, high yield fixed income, and other appropriate asset classes and investments.

The Adviser shall direct the rebalancing of asset allocation Models on a quarterly basis.

Participants and beneficiaries alone bear the risk of investment results from the options and asset allocation that they select.

#### Plan Service Provider Proposal Research and Analysis

The Adviser may assist Clients with the selection of a plan provider or providers for their plan, based on detailed research and analysis of several providers. The provider review process includes an evaluation of administrative, recordkeeping, compliance, and employee communications services, administrative and investment-related fees, and an investment overview that incorporates a very similar analysis to the investment due diligence process described above.

#### Newsletter Campaign

Monthly employer newsletter includes industry and marketplace updates, plan design and compliance suggestions, and legislative updates.

#### Market Review

The Adviser prepares quarterly market reviews to help inform and educate the client on the performance and events surrounding the capital markets.

#### Plan Design Guidance

The Adviser provides in-depth plan reviews that include an analysis of relevant design features, including: age and length of service eligibility requirements; vesting; forfeitures; employer matching contributions formulas; entry and re-entry dates; and other pertinent design features.

#### Management of Conversion Process

Adviser will assist Client with conversions between investment providers, including (i) interfacing with company consultants and relationship managers to facilitate the conversion, (ii) providing sample letters and correspondence related to the plan conversion, and (iii) monitoring the action items identified in the NFP Retirement Conversion Checklist™.

#### Fiduciary Plan Review

The Fiduciary Plan Review™ includes a compliance checklist, plan design analysis, and other related analysis designed to address plan compliance and efficiency. This document typically exceeds 20 pages in length and may also include a list of action items and suggestions, based on plan demographics and a discussion by the Client's plan fiduciaries and NFPR.

#### General Plan Consulting Services

NFPR will assign a Plan Adviser, who is responsible for responding to ongoing questions, concerns, and issues raised by the Adviser that are related to Client's qualified or non-qualified retirement plan. Services include plan pricing and contract negotiation by the incumbent provider and Client, recommendations of specific service and product enhancements, facilitation for the solution of service, administrative, and recordkeeping issues, plan compliance assistance and guidance, and ongoing problem solving. NFPR may provide a "help email" address, and "1-800" phone consultation assistance for participants.

#### 404(c) Audit

NFPR will provide a comprehensive checklist of the latest industry accepted standards with respect to 404(c) compliance, and will work with Client to facilitate completion of the checklist. The responsible party for addressing and verifying each item will either be; the plan provider, the Customer, or in some instances NFPR will provide the research and analysis.

#### Fiduciary Role under ERISA

For those services stated under Investment Advice (Plan Level) the Adviser acknowledges that it is a fiduciary with respect to the Plan under Section 3(21)(A)(ii) of the Employee Retirement Income Security Act of 1974, as amended (ERISA) and, as such, is a co-fiduciary with the trustee(s) of the Client's Plan solely with respect to (a) the provision of investment education of the employer and/or plan participants (depending on the specific Advisory services provided); (b) the periodic reporting on, and analysis of, the investment options available under the Plan; and (c) the provision of advice to the trustee(s) regarding the elimination or addition of investment options available under the Plan; provided, however, that the trustee(s) acknowledge and agree that the trustee(s) have the final and conclusive responsibility for the investment options selected to be available under the Plan.

For those services stated under Investment Management (Plan Level), the Adviser acknowledges that it is a co-fiduciary with respect to the Plan under Section 3(38) of the Employee Retirement Income Security Act of 1974, as amended (ERISA). The co-fiduciary duties of the Adviser are limited to the selection, mapping, monitoring, and replacement of plan investment options for which they have explicit authorized discretionary control.

The Adviser will not be responsible for investment decisions made by individual Plan participants with respect to the investment of their accounts and/or investment into a model portfolio managed by Adviser, if applicable. The Adviser is not responsible for any fiduciary duties or responsibilities imposed on the Plan's fiduciaries under ERISA not explicitly contemplated in the services stated under the Investment Management (Plan Level) section. The Adviser will not be responsible for investment decisions made by the Plan participants with respect to the investment of their accounts.

For those services stated under Employee (Participant) Investment Advice and/or Asset Allocation Models, the Adviser acknowledges that it is a limited scope fiduciary with respect to the Plan under Section 3(38) of ERISA. The Adviser is a fiduciary to the Plan under Section 3(38) of ERISA for only those services under this Agreement for which they have explicit authorized discretion over plan assets. The Adviser is authorized by the Client to exercise its best judgment in investing, selling and reinvesting cash and securities of Participants and Beneficiaries who have elected to use the Models, but only to the extent such actions relate to determining allocation based on the Models, adjustments thereof, or rebalancing of the Models. The Client does not authorize, nor does the Adviser accept, any discretionary authority outside the scope of this paragraph.

#### **Portfolio Management**

Some Investment Adviser Representatives of the Adviser perform investment management services for portfolios of their clients. The nature of the portfolios is limited primarily to mutual funds and ETFs but may have some individual securities as well. The Investment Adviser Representatives manage the portfolios on a discretionary basis and on a case by case basis may undertake a non-discretionary account. The Investment Adviser Representatives are responsible for the maintenance and rebalancing of the portfolio accounts in addition to communicating with the clients on the performance of their portfolio. The portfolio management accounts are with Charles Schwab and Fidelity as custodians and the Adviser does not maintain custody of client funds or securities in the provision of this service.

#### **Product and Services Conflict of Interest**

NFPR provides services that may recommend the purchase of services and/or products that are also offered by NFP Corp. and its affiliates. There is an inherent conflict of interest when a product or service recommends use of other products or services offered by NFP Corp. and its affiliates. The Adviser or its associated persons may receive compensation for these products and services. The Adviser does not make any representation that these products and services are offered at the lowest available cost and the client may be able to obtain the same products or services at a lower cost from other providers. However, the client is under no obligation to accept any of the recommendations of the Adviser or use the services and/or products of the Adviser in particular.

#### **WRAP Programs**

The Adviser does not sponsor a WRAP program nor does the Adviser act as an investment adviser or provide investment advice to a WRAP program.

#### **Tailored Relationships**

The goals and objectives for each client are documented in investment policy statements that are created to reflect the stated goals and objectives of the client. Clients may impose restrictions on investing in certain securities or investment products.

#### **Assignment of Investment Management Agreements**

Agreements may not be assigned without client consent.

## Termination of Agreement

This agreement may be terminated by either party upon providing written notification to the other party. Adviser will not accept any termination instructions, including account liquidation instructions, unless provided in writing by Client. In the event of termination of this agreement, Adviser shall have no obligation whatsoever to recommend any action with respect to the assets in Client's account. Adviser shall be paid its fees in connection with its services provided hereunder for the period to such termination.

Clients who wish to terminate this Agreement must notify the Adviser in writing within five (5) business days of its date of initial execution (shown below). If services are terminated within (5) business days from the date of executing this Agreement (shown below), services will be terminated without penalty. After the initial (5) business days, the Client may be responsible for payment of fees for the number of days services are provided by the Adviser prior to receipt of the notice of termination.

## Investment Advice Assets

As of September 30, 2017 Adviser advises on a total of \$39,039,000,000 on a non-discretionary basis and \$1,480,000,000 on a discretionary basis.

## Item 5 – Advisory Fees and Compensation

For the Adviser's services a client will pay a fee based on either the market value of the Plan assets, or a flat fee in accordance with the schedule of fees described and selected below unless otherwise agreed to by both parties. The fee range for the Adviser's services is negotiable and may vary according to the facts and circumstances including the scope of services to be provided, the duration of services and the size of the client (number of employees, plan or individual assets, and other demographic factors).

Under these services, clients will be charged a flat base fee plus a percentage of total Plan assets, based on the sliding scale below. Therefore, clients will be charged a total fee that is the sum of the base fee and the appropriate percentage fee for that portion of the Plan which falls within the value ranges as specified below. The Adviser may receive fees directly from a client (plan sponsor or individual), for providing any or all of the services described above. In these instances, fees may be paid on a one-time only or ongoing basis, depending on the scope of the services, and the desired length of time that those services will be provided.

### Fee Structure

#### Asset-based Fee

Asset-based fees may be charged based on the market value of the plan assets and may range from 0.50% - 1.25% of Plan assets, depending on the scope of the project and duration of services.

#### Flat Fee

A flat fee may be charged ranging from \$2,000 – \$500,000 or more depending on the scope of the project and duration of services.

#### Per-participant Fee

A per-participant fee may be charged ranging from \$150 - \$250 or more depending on the scope of the project and duration of the services.

#### Hourly Fee

An hourly fee may be charged ranging from \$250 - \$350 or more per hour depending on the scope of the project and duration of the services.

Fees are paid in advance except when deducted from the Plan assets with approval of the client or when the client is billed directly or some combination of both. Fees are paid by the Plan or Plan Sponsor. Clients are paying fees different than those above as they are based on historical fee schedules. Any fees paid in advance but are unearned shall be returned to the client prorated to the date of termination.

Plan providers often will offer compensation related to the Adviser's use of its platform to provide a mutual fund "line-up" to plan participants. The compensation is not related to the recommendation of particular mutual funds to be included in the line-up, but is related to the use of the overall platform of the plan provider. The amount of this compensation required by the Adviser is typically 15-35 basis points of plan assets invested. Should the plan provider offer higher compensation than what the Adviser requires, the extra amount is placed into the ERISA fiduciaries service budget for use to cover other plan expenses.

This compensation offered by plan providers is paid through a brokerage firm with which employees of the Adviser are also registered representatives. The compensation is paid to the principals of the firm individually who then transfer all of the funds back to NFPR. If the fees received are related to an Investment Advisory client (a client under an investment management agreement), the contracted fee of that client per the terms of the agreement is reduced by the amount of the plan provider compensation. Clients are not subject to higher fees/expenses when using a plan provider that offers the platform usage compensation. However, a conflict of interest exists for the Adviser where a plan provider offers platform usage compensation. This conflict is mitigated by the fact that the fee has a ceiling based on the needs of the Adviser to provide services to the plan and extra compensation goes to the plan. Further, the fiduciary obligations as a registered investment adviser and as an ERISA plan service provider are such that the Adviser carefully monitors this activity to ensure clients do not pay fees in excess of their contracted amount.

#### Portfolio Management Fees

The fees charged by the Investment Adviser Representatives range from .50% - 1.25% based on the nature of the services provided, the nature and composition of the portfolio and the frequency that the portfolio is expected to have to be rebalanced. The exact fee is based on the negotiated amount between the client and the Adviser. It is possible that clients are paying fees different than the above range due to historical fee schedules. Investment management fees are collected quarterly or monthly and may be collected either in arrears or in advance. Payment in full is expected upon invoice presentation. Fees are deducted from the client account to facilitate billing as authorized by the investment management agreement. When fees are collected in advance, any unearned fees will be returned to the client upon termination.

#### **Other Fees**

The client will likely incur fees from brokerages, custodians, administrators and other service providers. These fees are incurred as a result of managing a client account and are charged by the service provider.

The amount and nature of these fees is based on the service provider's fee schedule(s) at the provider's sole discretion. These fees are separate and distinct from any fees charged by the Adviser.

The Adviser may provide advice on mutual funds, ETFs, and other managed products or partnerships in clients' portfolios. Clients may be charged for the services by the providers/managers of these products in addition to the service fees paid to the Adviser. The Adviser, from time to time, may select or recommend to separately managed clients the purchase of proprietary investment products. To the extent the client's separately managed portfolio includes such proprietary products the Adviser will adjust the client's fee associated with the client's separately managed account. The fees and expenses charged by the product providers are separate and distinct from the management fee charged by the Adviser. These fees and expenses are described in each mutual fund's or underlying annuity fund's prospectus or in the offering memorandums of a partnership. These fees will generally include a management fee, other fund expenses and a possible distribution fee. No-load or load waived mutual funds may be used in client portfolios so there would be no initial or deferred sales charges; however, if a fund that imposes sales charges is selected, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund or variable annuity or investment partnership directly, without the services of the Adviser. Accordingly, the client should review both the fees charged by the funds and the applicable program fee charged by the Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the Advisory services being provided.

### **Conflict of Interest Between Different Fee Structures**

The Adviser offers several different services detailed in this brochure that compensate the Adviser differently depending on the service selected. There is a conflict of interest for the Adviser and its associated personnel to recommend the services that offer a higher level of compensation to the Adviser through either higher management fees or reduced administrative expenses. The Adviser mitigates this conflict through its procedures to review client accounts relative to the client financial situation to ensure the investment management service provided is appropriate. Further, the Adviser is committed to its obligation to ensure associated persons adhere to the Adviser's Code of Ethics and to ensure that the Adviser and its associated persons fulfill their fiduciary duty to clients or investors.

## **Item 6 - Performance Fees**

Fees are not based on a share of the capital gains or capital appreciation of managed securities. The Adviser may provide advice on certain types of investments that do charge a performance fee in which the Adviser does not participate. For these investments, refer to their offering or private placement memorandum for an explanation and amounts of the performance fees.

## **Item 7 - Types of Customers**

### **Retirement Plan Services**

Adviser provides Investment Advisory services to pension and profit sharing plans of corporations and other business entities.

### **Portfolio Management Services**

The Adviser provides portfolio management services to individuals, wealthy individuals, trusts, estates, corporations and other business entities.

Account Minimums

The minimum account size is \$25,000 of assets under management. The Adviser has the sole discretion to waive the account minimum and in those cases the standard fee calculation remains the same. Accounts of less than \$25,000 may be set up when the client and the Adviser anticipate the client will add additional funds to the accounts bringing the total to \$25,000 within a reasonable time. Other exceptions will apply to employees of the Adviser and their relatives, or relatives of existing clients.

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

Retirement Plan Services Strategies

The primary investment strategies utilized are passive (index) and actively managed mutual funds. Funds utilized are diversified to minimize the risk associated with the capital markets.

Portfolio/Model Construction

Asset allocation modeling involves the use of modern portfolio theory utilizing research from third party providers and proprietary analysis conducted by the Adviser.

Portfolio Management Strategies

The specific strategy or allocation model is determined by the Investment Adviser Representative of the client. However, in general the portfolio's consist of mutual funds and ETFs, but may occasionally contain individual securities. These portfolios do not require frequent trading.

## **Market, Security and Regulatory Risks**

Any investment with the Adviser involves significant risk, including a complete loss of capital and conflicts of interest. All investment programs have certain risks that are borne by the investor which are described below:

**Market Risks:**

Material Non-Public Information. By reason of their responsibilities in connection with other activities of the Adviser and/or its affiliates, certain principals or employees of the Adviser and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Accuracy of Public Information. The Adviser selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Adviser by the issuers or through sources other than the issuers. Although the Adviser evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Adviser is not in a position to

confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Investments in Non-U.S. Investments. From time to time, the Adviser may provide investment advice in non-U.S. securities and other assets (through mutual funds and otherwise), which will give rise to risks relating to political, social and economic developments abroad, as overall as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include: political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.

Enforcing legal rights in some foreign countries is difficult, costly and slow, and there are sometimes special problems enforcing claims against foreign governments.

Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Adviser may provide advice on foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the client's asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the client's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the client's foreign currency holdings. If the client enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the client enters forward contracts for the purpose of increasing return, it may sustain losses.

Non-U.S. securities, commodities and other markets may be less liquid, more volatile and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

## Regulatory Risks:

Strategy Restrictions. Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Adviser may engage. Such institutions, including entities subject to ERISA, should consult their own Advisers, counsel and accountants to determine what restrictions may apply and whether a fund or fund lineup recommended by the Adviser is appropriate.

Fund Offering Limitations. For all funds offered the fund sponsor or provider generally has the right to suspend or limit units offered under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the Adviser to loss.

Conflicts of Interest: In the administration of client accounts, portfolios and financial reporting, the Adviser faces inherent conflicts of interest which are described in this brochure. Generally, the Adviser mitigates these conflicts through its Code of Ethics which provides that the client's interest is always held above that of the Adviser and its associated persons.

### Security Specific Risks:

Depending on the nature of the investment management service selected by a client and the securities used to implement the investment strategy, clients will be exposed to risks that are specific to the securities in their particular investment portfolio.

Currency: 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.

### **Item 9 – Disciplinary Information**

Neither Adviser or an employee of Adviser have been or are currently involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Adviser or an employee of Adviser:

1. Has been convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Has been the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Has been found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the client's Adviser or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

Neither Adviser or an employee of Adviser have been or are currently involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Adviser or an employee of Adviser:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
  - (a) Denying, suspending, or revoking the authorization of Adviser to act in an investment-related business;
  - (b) Barring or suspending Adviser with an investment-related business;
  - (c) Otherwise significantly limiting Adviser investment-related activities; or
  - (d) Imposing a civil money penalty of more than \$2,500 on Adviser.

## **Item 10 - Other Financial Industry Activities and Affiliations**

### **Brokerage Affiliations**

Some of the Adviser's Advisory associates are registered representatives of Kestra Investment Services LLC, and may suggest that clients execute transactions through Kestra Investment Services LLC. If clients freely choose to execute transactions through Kestra Investment Services LLC, such Advisory representatives may receive the normal commissions and/or other compensation as sales agents resulting from any securities transactions, presenting associated persons with a conflict of interest. Furthermore, in implementing an investment strategy through relationships maintained by associated persons, clients may pay commissions or fees that are higher or lower than those that may be obtained from elsewhere for similar services. Clients are advised that they are under no obligation to implement the plan or its recommendations through the associated persons in their capacities as registered representatives. Generally, these recommendations are based on the Adviser's perception of the breadth of services offered, and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from elsewhere for similar services.

### **Parent and Related Party Affiliations**

NFP Retirement Inc. is owned by NFP Corp. (NFP), which owns other registered investment advisers, broker-dealers, insurance agencies and other product and service providers (NFP Affiliates). From time to time, we may recommend that you purchase or sell products and services from or through NFP Affiliates and these NFP Affiliates and our firm may receive compensation as a result of such recommendations. A recommendation that you purchase or sell products or services from or through an NFP Affiliate may be deemed to create a conflict of interest since it could result in increased compensation to an NFP Affiliate or our firm.

Certain private investment funds advised by Madison Dearborn Partners, LLC (MDP) indirectly own interests in NFP. MDP is an investment adviser registered with the Securities and Exchange Commission. However, MDP does not have any involvement in the day-to-day investment or other business operations of NFPR or the NFP Affiliates. Neither NFP nor MDP control or direct the investment recommendations that NFPR provides to its clients. All such recommendations in connection with the services provided to such clients are solely made by NFPR. In the case of NFPR clients that are subject to the Employee Retirement Income Security Act of 1974 (ERISA), additional or different rules may apply to the determination of whether MDP is an "affiliate" or "under common control" with NFPR or MDP. NFPR evaluates, and will continue to evaluate, any potential conflict of interest arising from our relationship with MDP.

Under the rules and regulations of FINRA, Kestra Investment Services LLC, has obligations to maintain records and perform other functions regarding certain aspects of the Investment Advisory activities of its registered representatives in relation to certain Advisory accounts for which its registered representatives provide investment advice. These obligations require Kestra Investment Services LLC, to coordinate with, and have the cooperation of the account custodian.

In order to fulfill its obligation, Kestra Investment Services LLC, has established a list of custodian and brokerage Advisers with which it has arranged to obtain the required cooperation, and which therefore may be utilized for custody of accounts directly advised either by registered representatives of Kestra Investment Services LLC, who are Investment Advisers or other Investment Advisory entities which are

affiliated with registered representatives of Kestra Investment Services LLC. In certain instances, Kestra Investment Services LLC, will collect, as paying agent for the Adviser, the Investment Advisory fee remitted to the Adviser by the account custodian, and Kestra Investment Services LLC, will retain a portion as a charge to the Investment Adviser (not the client) for the functions Kestra Investment Services LLC, is required to carry out by FINRA. This fee will not increase execution or brokerage charges to the client or the fee the client has agreed to pay to the Adviser pursuant to the client's Advisory agreement. A portion of the fee retained by Kestra Investment Services LLC, may be re-allocated to other registered representatives of Kestra Investment Services LLC, who, as registered representatives of Kestra Investment Services LLC, are responsible for the supervision of other representatives and assist Kestra Investment Services LLC, with the functions described above.

As required by regulation, Adviser must disclose and does disclose several affiliated Investment Advisers ("Affiliated Advisers") in response to certain items in Part I of its Form ADV, which is publicly available on the SEC website. The Affiliated Advisers are affiliated with Adviser solely by virtue of being under common control with NFP Corp. These Affiliated Advisers have no material impact on the day to day business operations of Adviser nor are they involved in any way in the provision of Advisory services to a client's account.

### **Advisory Dual Registration**

Some advisers are dually licensed as Investment Adviser Representatives with NFP and an affiliated firm flexPATH Strategies LLC. flexPATH provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

### **Related Person Affiliations**

Some associated persons of the Adviser are insurance agents/brokers of various insurance companies. In such capacities, associated persons of the Adviser may receive normal commissions and/or other compensation associated with those activities. In addition, as registered representatives, associates may receive payments from certain mutual funds distributed pursuant to a 12b-1 distribution plan or other such plans as compensation for administrative services, representing a separate financial interest on the Advisory associate's behalf. As such, a substantial conflict of interest may exist with respect to recommendations to buy or sell securities. Such conflicts are disclosed in the applicable Advisory contract with clients.

### **Affiliated Companies**

Through common ownership the Adviser is closely affiliated with Retirement Plan Advisory Group (RPAG). RPAG provides back office and administrative solutions for other retirement plan Advisory groups. Neither firm is not involved in providing advice on or transacting securities. On some occasions either of these companies may hold corporate events where the Adviser provides support and services and where product providers (i.e. Mutual Fund Companies) may cover all or part of the cost of an event. Typically the Affiliated Companies will reimburse the Adviser for its expenses related to such event support. This reimbursement is separate and distinct from any support received from product providers and is in no way dependent upon the existence of support from product providers.

In all cases, transactions are effected in the best interests of the client. Adviser does not permit insider trading and has implemented procedures to ensure that its policy regarding insider trading is being observed by Advisory associates.

## **Item 11 - Code of Ethics, Participation or Interest in Customer Transactions and Personal Trading**

### Code of Ethics

The Adviser has adopted a Code of Ethics which establishes standards of conduct for its supervised persons. The Code of Ethics includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information. It requires supervised persons to report their personal securities transactions and holdings quarterly to the Adviser's Compliance Officer, and requires the Compliance Officer to review those reports. It also requires supervised persons to report any violations of the Code of Ethics promptly to the Adviser's Compliance Officer. Each supervised person of the Adviser receives a copy of the Code of Ethics and any amendments to it and must acknowledge in writing having received the materials. Annually, each supervised person must certify that he or she complied with the Code of Ethics during that year. Clients and prospective clients may obtain a copy of the Adviser's Code of Ethics by contacting the Compliance Officer of the Adviser.

### Participation or Interest in Client Transactions

Under the Adviser's Code of Ethics, the Adviser and its managers, members, officers and employees may invest personally in securities of the same classes as are purchased for clients and may own securities of the issuers whose securities are subsequently purchased for clients. If an issue is purchased or sold for clients and any of the Adviser, managers, members, officers and employees on the same day purchase or sell the same security, either the clients and the Adviser, managers, members, officers or employees shall receive or pay the same price or the clients shall receive a more favorable price. The Adviser and its managers, members, officers and employee may also buy or sell specific securities for their own accounts based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients.

### Personal Trading

The Chief Compliance Officer of the Adviser is Jeff Groves. He reviews all employee trades each quarter (except for his own trading activity that is reviewed by another principal or officer of the Firm) versus the Advisers Restricted List of securities. Issuers on the Restricted List require preapproval for Adviser personnel to transact upon in their own personal brokerage accounts. 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.

## Item 12 - Brokerage Practices

### Brokerage Recommendations

#### Retirement Plan Services

The Adviser does not recommend brokerage or custodial providers for its retirement planning clients.

#### Portfolio Management Services

The Adviser has the authority over the selection of the broker to be used and the commission rates to be paid without obtaining specific client consent. The Adviser recommends brokerage firms (qualified custodians) such as Charles Schwab and Fidelity Investments ("Adviser Custodians").

As a result the Adviser receives some benefits, the primary one being access to the Adviser Custodians' website and downloads that communicate with the Adviser's software for portfolio management and other technology that enables Adviser to serve clients. Adviser Custodians provide periodic reports that address contemporary financial services issues and compliance newsletters that assist Adviser in maintaining an up-to-date compliance program. Adviser Custodians also may arrange group purchase discounts of some research subscriptions, but the value of those to Adviser are not significant as comparable discounts are available to advisers not using the Adviser Custodians.

The Adviser occasionally participates in conference calls hosted by Adviser Custodians that are helpful in running its business and in serving clients. Adviser believes that Adviser Custodians' technology is state of the art for the way that Adviser manages client accounts and helps Adviser keep trading costs down. All clients benefit equally from this technology because it allows the Firm to execute transactions in the same manner in all accounts, to the extent that it is appropriate. Adviser also receives some measurement of its business at Adviser Custodians and insight as to how its business compares with other comparable Advisory firms that use Adviser Custodians' services.

The Adviser's accounts may be deemed to be paying for research and related services (i.e., "soft dollars") provided by the broker which are included in compensation to the broker dealer (Excluding ERISA clients). Research and related services furnished by brokers may include, but are not limited to, written information and analyses concerning specific securities, companies or sectors; market, financial and economic studies and forecasts; financial publications; statistical and pricing services, as well as discussions with research personnel, along with hardware, software, data bases and other technical and telecommunication services and equipment utilized in the investment management process. It is the policy and practice of the Adviser to strive for the best price and execution for costs and discounts which are competitive in relation to the value of the transaction and which comply with Section 28(e) of the Securities Exchange Act of 1934, as amended. Nevertheless, except with ERISA clients it is understood that the Adviser may pay compensation on a transaction in excess of the amount of compensation that another broker or dealer may charge so long as it's in compliance with Section 28(e) and the regulations promulgated thereunder, and The Adviser makes no warranty or representation regarding compensation paid on transactions hereunder. In negotiating mark-ups or mark-downs, the Adviser will take into account the financial stability and reputation of brokerage firms and the brokerage and research services provided by such brokers, although the client may not, in any particular instance, be the sole direct or indirect beneficiary of the research services provided.

### Order Aggregation

The nature of the clients and/or trading activity on behalf of client accounts are such that trade aggregation does not garner any client benefit (in regards to mutual fund or exchange traded funds for example).

### Directed Brokerage and Directing Brokerage for Client Referrals

Clients are responsible for establishing their particular brokerage and custodial relationships. The Adviser and its associated persons do not receive client referrals from broker dealers or third parties as consideration for selecting or recommending brokers for client accounts.

## **Item 13 - Review of Fund Recommendations and Accounts**

### Review of Fund Recommendations

All reviews are conducted on a quarterly or semi-annual basis, using the same factors and comprehensive criteria at each review. Overall market changes and changes in the investment objectives of the fund are taken into account in the review process. Any material changes to a client's investment option may trigger a review, including, but not limited to; a change in the underlying manager, the removal of that specific investment option, or the mapping of the current investment option into another investment option by the plan provider. Account reviews are conducted by the designated investment adviser professional primarily responsible for each account.

As may be retained by clients, reports are individualized, thereby, the nature and frequency are determined by client need and the services offered. However, as clients may request, NFPR may provide quarterly or semi-annual reports detailing research and analysis with regard to investment advice and fiduciary due diligence services. The research and analysis may cover the investment products of several qualified retirement plan providers. The goals of the investment due diligence process are to establish a logical, technical, and comprehensive process that is consistently employed in the selection and ongoing monitoring of funds for plan sponsors and individuals, accompanied by an investment policy statement (for plan sponsors only), that defines the process utilized to recommend the investments to plan sponsors and individuals.

### Review of Portfolio Management Accounts

#### Periodic Reviews

Account reviewers are the Investment Adviser Representatives responsible for each account. Account reviews are performed monthly by Adviser representatives. 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. The Compliance Officer conducts a quarterly review of trading activity and client accounts as a follow up measure to the representatives' reviews.

#### Review Triggers

Accounts are reviewed monthly or more frequently when market conditions dictate. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's financial or personal situation.

### Regular Reports

Clients receive statements of account positions no less than quarterly from the account custodian.

## **Item 14 - Customer Referrals and Other Compensation**

The Adviser adds new clients through introductions by referral sources, including financial planners, Investment Advisers, accountants, attorneys, life insurance agents, pension consultants, third-party administrators, CPAs, health and welfare insurance agents, property and casualty insurance agents, and pension sales representatives employed by insurance company and mutual fund company 401(k) providers.

Under a typical arrangement, the referral source may be paid a one-time only fee or an ongoing percentage of the compensation that is paid to the Adviser for providing services. The exact financial arrangements may vary for each Client; however, each arrangement shall be in accordance with all federal, state, and self-regulatory organization (SRO) and insurance rules and regulations. Typically, referral sources are involved only in the initial introduction and possibly ongoing relationship management, and do not have any involvement in the services as provided by the Adviser.

The Adviser may pay a solicitor a referral fee in accordance with the requirements of *Rule 206(4)-3 of the Investment Advisers Act of 1940*, and any corresponding state securities law requirements. The solicitor, at the time of the solicitation, shall disclose the nature of the solicitor relationship, and shall provide each prospective client with a copy of the Adviser's written disclosure statement as set forth in Part 2A, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms and conditions of the arrangement between the Adviser and the solicitor, including the compensation to be received by the solicitor from the Adviser.

### **Participation or Interest in Client Transactions**

In their capacity as registered representatives, associates of the Adviser may receive payments from certain mutual funds distributed pursuant to a 12b-1 distribution plan or other such plans as compensation for administrative services, representing a separate financial interest. As such, a conflict of interest may exist with respect to recommendations to buy or sell securities. Where such distributions are received, the proceeds are passed onto the parent company of the Adviser. The client management fee is reduced by the same amount as any 12b-1 distribution paid to the Adviser. In all cases, transactions are effected in the best interests of the client. The Adviser does not permit insider trading and has implemented procedures to ensure that its policy regarding insider trading is being observed by associated persons.

Associated persons may own an interest in or buy or sell for their accounts the same securities, which may be purchased or sold in the accounts of Advisory clients. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients and their personal transactions are regularly monitored. Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell specific securities for their accounts based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients.

### Referrals to Third Parties

On occasion Adviser may refer clients to other professionals for services that Adviser is unable to perform, primarily banking, accounting and/or legal services. Although there is no direct monetary benefit derived from these arrangements, they are mutually beneficial and provide an indirect benefit. Adviser will never base its referrals solely on any reciprocal arrangement in place. Reciprocal arrangements are a professional courtesy so a non-compete and nondisclosure agreement is the only formal document signed. Clients may review these agreements at any time.

## Item 15 - Custody

All assets in Client's account shall be held for safekeeping with a designated custodian as selected by the Client. Adviser shall not act as Custodian for any assets in the Client's account and shall not take possession of cash and/or securities of the Client's account. Adviser shall not be liable to Client for any act, conduct or omission by Custodian. Adviser is only authorized or empowered to issue instructions to Custodian or to request information about the Account from Custodian for the limited purpose of managing the asset allocation of the Models. The Adviser shall have no other discretion or control in regards to Custodian instruction.

For the portfolio management services, the Adviser's custodial agreement may enable the Adviser to withdraw, or transfer, client funds or securities upon instruction to the custodian. If this is the case the custodial agreement is in conflict with the Adviser's Investment Management Agreement. The Adviser's operations only take custody within the scope of fee withdrawal from a client's account. The COO and CCO of the Adviser review money handling activity of the Adviser to ensure that custody of client funds is not exercised beyond what is provided for in the Investment Management Agreement irrespective to the terms that may be in the Adviser's custodial agreement(s).

## Item 16 - Investment Discretion

### Retirement Plan Services

In its non-discretionary role, the Adviser provides investment advice at the Plan level where the Adviser shall provide research and analysis with regard to investment advice and fiduciary due diligence services for the Client. The Adviser shall also provide research and analysis that covers the investment products of several qualified and non-qualified retirement plan providers. The goal of the investment due diligence process is to establish a logical, technical, and comprehensive process that is consistently employed in the selection and ongoing monitoring of funds for plan sponsors and individuals, accompanied by an investment policy statement (for plan sponsors only), that defines the process utilized to recommend the investments to plan sponsors and individuals.

In the Adviser's role of providing investment *management* at the Plan level, the Adviser shall be responsible and maintains discretion, for the selection, mapping, and ongoing monitoring, of investments offered within the Plan. The Adviser hereby accepts co-fiduciary responsibility for such duties. The Client engages the Adviser for management of Plan assets and shall delegate specified authority and discretion to the Adviser for the selection, mapping, and ongoing monitoring (including replacement, as prudent), of investments offered within the plan.

### Portfolio Management Services

The Adviser contracts for limited discretionary authority to transact portfolio securities accounts on behalf of clients. Discretionary authority is granted either by the Adviser's investment management agreement and/or by a separate limited power of attorney where such document is required. The Adviser has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The firm's discretionary authority regarding investments may however be subject to certain limitations. These limitations are recognized as the restrictions and prohibitions placed by the Client on transactions in certain types of business or industries. All such restrictions are to be agreed upon in writing at the account's inception. At the Adviser's sole discretion, non-discretionary portfolio management clients may be accepted. The Adviser will consult with the client where discretion is not obtained prior to each trade in order to obtain client approval for the transaction(s).

The client authorizes the discretion to select the custodian to be used and the commission rates paid to the Adviser. The Adviser does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

### **Item 17 - Voting Customer Securities**

Adviser does not have nor will accept authority to vote customer securities. Adviser requests that customers engage another party to determine how proxies should be voted. Adviser does not provide proxy voting services to its customers.

### **Item 18 - Financial Information**

The Adviser does not have any financial impairment that will preclude the Adviser from meeting contractual commitments to clients. The Adviser meets all net capital requirements that it is subject to and the Adviser has not been the subject of a bankruptcy petition in the last 10 years. The Adviser is not required to provide a balance sheet as it 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.

## **NFP Retirement Inc.**

### **Privacy Policy**

NFPR requires that you provide current and accurate financial and personal information. NFPR will protect the information you have provided in a manner that is safe, secure and professional. NFPR and its employees are committed to protecting your privacy and to safeguarding that information.

#### **Safeguarding Client Documents**

NFP uses encryption technologies on all electronic mail communications, mobile devices and laptops, wireless access and on servers, when the circumstances allow and dictate. In addition, NFP maintains a cyber-liability policy. We collect non-public client data in checklists, forms, in written notations, and in documentation provided to us by our clients for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours access to client records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the client records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial client information. No individual with authorization to access personal and financial client information shall share that information in any manner without the specific consent of a Firm principal. Failure to observe NFPR procedures regarding client and consumer privacy will result in discipline and may lead to termination.

#### **Sharing Nonpublic Personal and Financial Information**

NFPR is committed to the protection and privacy of its clients' and consumers' personal and financial information. NFPR will not share such information with any affiliated or nonaffiliated third party except:

- When required to maintain or service a client account;
- To resolve client disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the client;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of NFPR's business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide Advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the client's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

### **Opt-Out Provisions**

It is not a policy of NFPR to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service client accounts or is mandated by law, there are no allowances made for clients to opt out.

## **BUSINESS CONTINUITY PLAN**

NFPR has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

### **CONTACTING US**

If after a significant business disruption the client cannot contact us as the client usually does the client should call the Adviser's alternative number 949.460.9898 or access the Adviser web address [www.nfp.com/retirement](http://www.nfp.com/retirement).

### **OUR BUSINESS CONTINUITY PLAN**

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery, all mission critical systems, financial and operational assessments, alternative communications with customers, employees, and regulators, alternate physical location of employees, critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

### **VARYING DISRUPTIONS**

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover within 24 hrs. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume businesses in a timely fashion with emphasis on recovery of critical functions according to their time criticality. In either situation, we plan to continue in business and notify you through our web site or direct email how you may contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

### **FOR MORE INFORMATION**

If you have questions about our business continuity planning, you can contact us at 949.460.9898 or email our Chief Operations Officer, Jami Chapman at [jami.chapman@nfp.com](mailto:jami.chapman@nfp.com).



**NFP Retirement, Inc.**  
**dba 401(k) Advisers**  
**dba 403(b) Advisers**

**Registered Investment Adviser**

**120 Vantis, Suite 400 Aliso Viejo, CA 92656**

**Phone: 949.460.9898**

**Fax: 949.460.9893**

**[www.nfp.com/retirement](http://www.nfp.com/retirement)**

**October 16, 2017**

**FORM ADV BROCHURE**  
**PART 2B**

(Item I)

This brochure provides information about principals and adviser representatives of NFPR and this brochure supplements the NFPR brochure. The client should have received a copy of that brochure. Please contact Joel Shapiro 949.460.9898 ext. 254 or by email at: [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com) if the client did not receive the NFPR brochure or if the client has any questions about the contents of this supplement. 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 the Adviser and its Investment Advisory representatives is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Education and Business Standards**

NFPR requires that Advisers have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning or at least 4 years of work experience as either a registered representative, Investment Adviser representative, or licensed insurance agent.

Examples of acceptable coursework may include: a MBA, a CFP, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, Advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

### **Education and Business Backgrounds**

The following pages present the education, business backgrounds and other important disclosures for the Investment Adviser Representatives of NFPR

## **James V. Adam, Investment Adviser Representative**

**Year of Birth:** 1948

**Education:** Mankato State University - B.S Accounting (Magna Cum Laude)

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/16/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 06/2003 to present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 08//2005 to Present  
Firm Name: NFP Corporate Services, (MN).  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 01/2000 to present  
Firm Name: Adam Concepts, Inc.  
Type of Business: Financial Institution  
Job Title & Duties: President

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, James Adam has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

James Adam is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through James Adam nor is there any assurance that any transaction is at the lowest available cost.

### **Item 5 - Additional Compensation**

In the course of business James Adam does not receive economic benefit from non-clients for providing Advisory services. James Adam may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

James Adam is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:

PHONE 949.460.9898 x 254;

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **William Preston Barnes IV, Investment Adviser Representative**

**Year of Birth:** 1967

**Education:** Drury College B.S Political Science, 1991

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	02/2006 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	02/2006 to 07/2014
Firm Name:	Financial Telesis Inc.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, William Preston Barnes IV has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

William Preston Barnes IV is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through William Preston Barnes IV.

### **Item 5 - Additional Compensation**

In the course of business William Preston Barnes IV does not receive economic benefit from non clients for providing Advisory services. William Preston Barnes IV may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

William Preston Barnes IV is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254
	EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>

## **Thomas Bastin, Investment Adviser Representative**

**Year of Birth:** 1964

**Education:** Purdue University – BA 1986  
Nova University – JD 1992  
University of Miami – LLM in Taxation Master of Law 1994

**Professional Designation(s):** Accredited Investment Fiduciary (AIF),  
Certified Employee Benefit Specialist (CEBS)

### **Employment for the Past Five Years:**

Employment Dates:	03/2016 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	11/2005 to 03/2016
Firm Name:	ERISA Fiduciary Advisers, Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Thomas Bastin has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Thomas Bastin is not currently engaged in any business or occupation for compensation in the financial industry or otherwise that provides a substantial source of income to Thomas Bastin or involves a substantial amount of Thomas Bastin's time.

### **Item 5 - Additional Compensation**

In the course of business Thomas Bastin does not receive economic benefit from a person or entity who is not a client for providing Advisory services.

### **Item 6 - Supervision**

Thomas Bastin is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254 EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>
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## **Jennifer Brooks, Investment Adviser Representative**

**Year of Birth:** 1970

**Education:** Seattle University, School of Law, Washington, 1996

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	2014 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	2014 to 03/2017
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	02/2008 to 11/2014
Firm Name:	Trucker Huss.
Type of Business:	Law Firm
Job Title & Duties:	Attorney

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Jennifer Brooks has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Jennifer Brooks.

### **Item 5 - Additional Compensation**

In the course of business Jennifer Brooks does not receive economic benefit from non clients for providing Advisory services.

### **Item 6 – Supervision**

Jennifer Brooks is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254 EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>
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## **Zachary Capaldo, Investment Adviser Representative**

**Year of Birth:** 1989

**Education:** Bachelor of Science

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 11/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 11/2016 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 11/2016 to present  
Firm Name: Lincoln Benefits Group  
Type of Business: Retirement Plans  
Job Title & Duties: Participant Education

Employment Dates: 11/2014 to 10/2016  
Firm Name: Mass Mutual  
Type of Business: Insurance  
Job Title & Duties: Agent

Employment Dates: 11/2014 to 10/2016  
Firm Name: MML Investment Services  
Type of Business: Investment Services  
Job Title & Duties: Registered Representative

Employment Dates: 12/2011 to 10/2014  
Firm Name: John M. Novak/Mass Mutual  
Type of Business: Retirement Plans  
Job Title & Duties: Financial Assistant

Employment Dates: 10/2004 to 12/2011  
Firm Name: Wesselt Capital Group  
Type of Business: Insurance  
Job Title & Duties: Agent

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Zachary Capaldo has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Zachary Capaldo is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Zachary Capaldo.

### **Item 5 - Additional Compensation**

In the course of business Zachary Capaldo does not receive economic benefit from non clients for providing Advisory services. Zachary Capaldo may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Zachary Capaldo is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Anthony Cardinal, Investment Adviser Representative**

**Year of Birth:** 1967

**Education:** University of Wisconsin, River Falls, B.A. Business Management, 1989

**Professional Designation(s):**

### **Employment for the Past Five Years:**

Employment Dates: 04/16/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 01/1998 to present  
Firm Name: Kestra Financial Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 12/1994 to present  
Firm Name: NFP Corporate Services (MN)  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Anthony Cardinal has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Anthony Cardinal is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Anthony Cardinal.

### **Item 5 - Additional Compensation**

In the course of business Anthony Cardinal does not receive economic benefit from non clients for providing Advisory services. Anthony Cardinal may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Anthony Cardinal is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.  
Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Charles Catagnus, Investment Adviser Representative**

**Year of Birth:** 1956

**Education:** Montgomery County Community College, Associate Degree, Accounting, 1976.  
Temple University, Bachelor of Business Administration Degree; Major: Marketing, 1979

**Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 01/2013 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 12/2006 to 12/2012  
Firm Name: Lincoln Financial Advisers  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Regional Director/Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Charles Catagnus not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or planning to file a bankruptcy petition.

#### **Item 4 - Other Business Activities**

Charles Catagnus is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Charles Catagnus.

#### **Item 5 - Additional Compensation**

In the course of business Charles Catagnus does not receive economic benefit from non clients for providing Advisory services. Charles Catagnus may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Charles Catagnus is supervised by Joel Shapiro. Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254.  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Jonathan Coombs, Investment Adviser Representative**

**Year of Birth:** 1983

**Education:** The Juilliard School, New York, NY. 2008

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 10/2015 to Present  
Firm Name: FlexPATH Strategies  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 11/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 11/2014 to 03/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 08/2010 to 08/2013  
Firm Name: Stecher and Horowitz Foundation  
Job Title & Duties: Director of Operations and Director of Web Design and Development

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Jonathan Coombs has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

In addition to his responsibilities at NFP Retirement Inc., Jonathan Coombs is an Investment Adviser Representative of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

Clients are under no obligation to purchase securities or Advisory services through Jonathan Coombs.

### **Item 5 - Additional Compensation**

Jonathan Coombs compensation is derived from flexPATH Strategies LLC.

### **Item 6 - Supervision**

Jonathan Coombs is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Nicholas D. Della Vedova, President**

**Year of Birth:** 1972

**Education:** Truman State University; B.S. Finance, 1994

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/2004 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: President

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer /Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 1/2015 to Present  
Firm Name: FlexPATH Strategies  
Type of Business: Investment Adviser  
Job Title & Duties: President

Employment Dates: 09/2016 to Present  
Firm Name: SST Benefits Consulting & Insurance Services, Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: President

Employment Dates: 12/2004 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Nicholas D. Della Vedova has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Nicholas D. DellaVedova is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities through Nicholas D. Della Vedova.

Nicholas D. Della Vedova is a principal of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

### **Item 5 - Additional Compensation**

In the course of business Nicholas D. Della Vedova does not receive economic benefit from non clients for providing Advisory services. Nicholas D. Della Vedova may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Nicholas D. Della Vedova is supervised by Vincent J. Giovinazzo, Chief Executive Officer. Vincent J. Giovinazzo's contact information:

PHONE 949.460.9898 x 250;  
EMAIL vince.giovinazzo@nfp.com

## **Marcel J. Dupré, Investment Adviser Representative**

**Year of Birth:** 1967

**Education:** Loyola University New Orleans, LA 1994 graduate – J.D. (law degree)  
Loyola University New Orleans, LA 1994 graduate – M.B.A.  
University of Southern Miss Hattiesburg, MS 1991 graduate – B.S.B.A. Economics

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 10/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2013 to 2015  
Firm Name: Billeaud Capital Management Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 09/2010 to 08/2013  
Firm Name: Thirty North Investments LLC  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 09/1999 to 09/2010  
Firm Name: Wealth Planners LLC  
Type of Business: Investment Adviser  
Job Title & Duties: Managing Director

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Marcel J. Dupré has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Marcel J. Dupré is the sole owner of an Insurance Agency.  
Clients are under no obligation to Advisory services or Advisory services through Marcel J. Dupré.

### **Item 5 - Additional Compensation**

In the course of business Marcel J. Dupré does not receive economic benefit from non-clients for providing Advisory services.

### **Item 6 - Supervision**

Marcel J. Dupré is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.  
Joel Shapiro's contact information: PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

**Jeffrey Elvander, Chief Investment Officer**

**Year of Birth:** 1969

**Education:** MBA, Pepperdine University, 2001  
B.A. Business Economics, UCSB, 1993

**Professional Designation(s):** Chartered Financial Analyst (CFA)

<b>CFA - Chartered Financial Analyst</b>	
Designation	Chartered Financial Analyst
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CFA
Issuing Organization	CFA Institute
Prerequisites/Experience Required	Candidate must meet one of the following requirements: Undergraduate degree and four years of professional experience involving investment decision-making, or Four years qualified work experience (full time, but not necessarily investment related)
Educational Requirements	Self-study program (250 hours of study for each of the three levels)
Examination Type	Three course exams
Continuing Education/Experience Requirements	None

**Employment for the Past Five Years:**

Employment Dates: 07/2006 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to 02/14/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 12/2004 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

**Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Jeffrey Elvander has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory

organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

#### **Item 4 - Other Business Activities**

Jeffrey Elvander is a principal of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients. Clients are under no obligation to purchase securities or Advisory services through Jeffrey Elvander.

#### **Item 5 - Additional Compensation**

In the course of business Jeffrey Elvander does not receive economic benefit from non clients for providing Advisory services.

#### **Item 6 - Supervision**

Jeffrey Elvander is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

**Michael E. Falcone, Investment Adviser Representative**

**Year of Birth:** 1956

**Education:** BS Mathematics, Drexel University, Philadelphia, PA, 1979

**Professional Designation(s):** N/A

**Employment for the Past Five Years:**

Employment Dates: 01/2007 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to 03/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer and Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 01/2007 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer and Investment Adviser  
Job Title & Duties: Registered Representative

**Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Michael E. Falcone has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

**Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Michael E. Falcone.

**Item 5 - Additional Compensation**

In the course of business Michael E. Falcone does not receive economic benefit from non clients for providing Advisory services.

**Item 6 - Supervision**

Michael E. Falcone is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Richard Fellows, Investment Adviser Representative**

**Year of Birth:** 1950

**Education:** Georgetown Law 1987  
University of Minnesota, BA, Juris Doctor (JD), Master of Law (LLM), History, 1974

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 02/2012 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 01/2012 to 07/2016  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 01/2010 02/2012  
Firm Name: Mosse & Mosse  
Type of Business: Investment Adviser  
Job Title & Duties: Independent Contractor

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Richard Fellows has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Richard Fellows.

### **Item 5 - Additional Compensation**

In the course of business Richard Fellows does not receive economic benefit from non clients for providing Advisory services.

### **Item 6 – Supervision**

Richard Fellows is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Steven Festler, Investment Adviser Representative**

**Year of Birth:** 1986

**Education:** University of St. Thomas – MBA (09/2011 – 12/2014)  
Hamline University – Business Management with Economics minor  
(09/2005 – 01/2009)

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative/ Account Manager

Employment Dates: 04/2016 to present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 03/14 to Present  
Firm Name: NFP Corporate Services, (MN).  
Type of Business: Investment Adviser  
Job Title & Duties: Account Manager

Employment Dates: 06/2009 to 02/2014  
Firm Name: Ameriprise Financial  
Type of Business: Financial Institution  
Job Title & Duties: Team Leader – Money Movement

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Steven Festler has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Steven Festler is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Steven Festler.

### **Item 5 - Additional Compensation**

In the course of business James Steven Festler does not receive economic benefit from non-clients for providing Investment Adviser services. Steven Festler may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Steven Festler is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Michael Filachek, Investment Adviser Representative**

**Year of Birth:** 1983

**Education:** Villanova University, Villanova PA MBA – Finance, 2012  
William Paterson University, Wayne NJ BS – Business Administration, 2005

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 05/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 12/2015 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 06/2005 to 12/2015  
Firm Name: Automatic Data Processing, LLC.  
Type of Business: Payroll Processing Company  
Job Title & Duties: District Manager

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Michael Filachek has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Michael Filachek is a registered representative and/or investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Michael Filachek.

### **Item 5 - Additional Compensation**

In the course of business Michael Filachek does not receive economic benefit from non clients for providing Advisory services. Michael Filachek may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 – Supervision**

Michael Filachek is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Allison Flink, Investment Adviser Representative**

**Year of Birth:** 1967

**Education:** Adelphi University, BA in Anthropology and Accounting, Garden City NY

**Designation(s):** Accredited Investment Fiduciary (AIF)

### **Employment for the Past Five Years:**

Employment Dates: 08/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 06/2012 to 08/2014  
Firm Name: 401(k) Concierge  
Type of Business: Investment Adviser  
Job Title & Duties: Managing Member and Chief Compliance Officer

Employment Dates: 09/2013 – 08/2014  
Firm Name: WFG Investments Inc.  
Type of Business: Broker Dealer  
Job Title & Duties: Insurance Agent and Registered Representative

Employment Dates: 10/2010– 09/2013  
Firm Name: NFP Securities, Inc.  
Type of Business: Broker Dealer and Investment Adviser  
Job Title & Duties: Registered Representative and Investment Adviser Representative

Employment Dates: 11/2009 – 10/2010  
Firm Name: NRP Financial, Inc.  
Type of Business: Broker Dealer and Investment Adviser  
Job Title & Duties: Registered Representative and Investment Adviser Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Allison Flink has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Allison Flink is a registered representative and/or investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions with Advisory fees. Clients are under no obligation to purchase securities or Advisory services through Allison Flink.

### **Item 5 - Additional Compensation**

In the course of business Allison Flink does not receive economic benefit from non clients for providing Advisory services. Allison Flink may receive compensation in connection with her registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Allison Flink is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Kellen Foley, Investment Adviser Representative**

**Year of Birth:** 1990

**Education:** Boston College, Bachelor of Arts, Economics, 2012

**Professional Designation(s):** Chartered Financial Analyst (CFA)

### **Employment for the Past Five Years:**

Employment Dates:	1/2015 to Present
Firm Name:	FlexPATH Strategies
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	09/2012 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Kellen Foley has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Kellen Foley is a registered representative and/or investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees.

In addition to his responsibilities at NFP Retirement Inc., Kellen Foley is an Investment Adviser Representative of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

Clients are under no obligation to purchase securities or Advisory services through Kellen Foley

### **Item 5 - Additional Compensation**

Kellen Foley's may receive compensation in connection with his registration as a registered representative with Kestra Investment Services LLC and an Investment Adviser representative of flexPATH Strategies LLC.

**Item 6 – Supervision**

Kellen Foley is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.  
Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Matthew Giovinazzo, Investment Adviser Representative**

**Year of Birth:** 1990

**Education:** University California – Los Angeles, 2013

**Professional Designation(s):** Chartered Financial Analyst (CFA)

### **Employment for the Past Five Years:**

Employment Dates:	04/2013 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative
Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative
Employment Dates:	1/2015 to Present
Firm Name:	FlexPATH Strategies
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative
Employment Dates:	09/2013 to 07/2014
Firm Name:	Financial Telesis Inc.
Type of Business:	Broker Dealer and Investment Adviser
Job Title & Duties:	Registered Representative
Employment Dates:	09/2009 to 06/2013
Firm Name:	University California – Los Angeles
Type of Business:	College
Job Title & Duties:	Student

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Matthew Giovinazzo has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Matthew Giovinazzo is a registered representative and/or investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees.

In addition to his responsibilities at NFP Retirement Inc., Matthew Giovinazzo is an Investment Adviser Representative of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

Clients are under no obligation to purchase securities or Advisory services through Matthew Giovinazzo.

#### **Item 5 - Additional Compensation**

Matthew Giovinazzo's may receive compensation in connection with his registration as a registered representative with Kestra Investment Services LLC and an Investment Adviser representative of flexPATH Strategies LLC.

#### **Item 6 – Supervision**

Matthew Giovinazzo is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information: PHONE 949.460.9898 x 254; EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

**Vincent J. Giovinazzo, Chief Executive Officer**

**Year of Birth:** 1959

**Education:** U.C.L.A. Los Angeles, CA; Undeclared (1978-1980)  
California State Northridge; B.A. Philosophy (1980-1983)

**Professional Designation(s):** N/A

**Employment for the Past Five Years:**

Employment Dates: 07/2006 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Chief Executive Officer

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 1/2015 to Present  
Firm Name: FlexPATH Strategies  
Type of Business: Investment Adviser  
Job Title & Duties: Chief Executive Officer

Employment Dates: 09/2016 to Present  
Firm Name: SST Benefits Consulting & Insurance Services, Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Chief Executive Officer

Employment Dates: 12/2004 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer and Investment Adviser  
Job Title & Duties: Registered Representative

**Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Vincent J. Giovinazzo has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

**Item 4 - Other Business Activities**

Vincent J. Giovinazzo is a registered representative and an investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Vincent J. Giovinazzo.

Vincent J. Giovinazzo is a principal of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

### **Item 5 - Additional Compensation**

Vincent J. Giovinazzo may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Vincent J. Giovinazzo is supervised by Nicholas Della Vedova, President. Nicholas Della Vedova's contact information:

PHONE 949.460.9898 x 246;

EMAIL [nick.dellavedova@nfp.com](mailto:nick.dellavedova@nfp.com)

## **Allan Glad, Investment Adviser Representative**

**Year of Birth:** 1953

**Education:** High School, Military Specialist 4 and Master Barber

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2016 to present  
Firm Name: Kestra Financial Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 01/2016 to present  
Firm Name: NFP Corporate Services, (MN).  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Relationship Manager

Employment Dates: 11/2011 to present  
Firm Name: Principal Life Insurance Co.  
Type of Business: Insurance Company  
Job Title & Duties: Agent

Employment Dates: 11/2011 to present  
Firm Name: Princor Financial Services Corp.  
Type of Business: Financial Institution  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Allan Glad has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Allan Glad is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Allan Glad.

### **Item 5 - Additional Compensation**

In the course of business Allan Glad does not receive economic benefit from non clients for providing Advisory services. Allan Glad may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Allan Glad is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:

PHONE 949.460.9898 x 254;

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)



## Amy Hanophy, Investment Adviser Representative

**Year of Birth:** 1971

**Education:** University of North Carolina at Wilmington, BA – Physical Education  
MA – Education Administration

**Professional Designation(s):** Chartered Retirement Plans Specialist (CRPS)

CRPS - Chartered Retirement Plans Specialist	
Designation	Chartered Retirement Plans Specialist
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CRPS
Issuing Organization	College for Financial Planning
Prerequisites/Experience Required	None
Educational Requirements	Online instructor led or self-study course
Examination Type	Final designation exam (online, closed-book, proctored)
Continuing Education/Experience Requirements	16 hours every two years

### Employment for the Past Five Years:

Employment Dates: 11/2010 to Present  
Firm Name: NFP Retirement, Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2014 to Present  
Firm Name: Kestra Investment Services, LLC  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 08/2010 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 03/2010 to 08/2010  
Firm Name: Great West  
Type of Business: Retirement Services  
Job Title & Duties: Institutional Relationship Manager

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Amy Hanophy has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Amy Hanophy is an Account Executive for CoBlz Retirement Advisory Services where she engages in retirement plan design and administration. She is also a registered representative and an investment adviser representative with Kestra Investment Services, LLC. a broker dealer. Clients are under no obligation to purchase securities or Advisory services through Amy Hanophy. She owns a single family property which she rents and maintains.

### **Item 5 - Additional Compensation**

In the course of business Amy Hanophy does not receive economic benefit from non clients for providing Advisory services. "Economic benefits" include sales awards and other prizes or any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts.

Amy Hanophy is also a securities registered representative and/or an investment adviser representative and may earn commissions on investment products in addition to receiving Investment Adviser fees. This practice may present a conflict of interest. In most cases, commissioned products are not placed under management for at least a twelve month period. Additionally, no load mutual funds are routinely recommended. Clients are under no obligation to purchase investment products that are recommended. Under certain circumstances Investment Adviser fees may or may not be offset with commissions earned depending upon the terms of the Investment Adviser contract.

### **Item 6 - Supervision**

Amy Hanophy is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL joel.shapiro@nfp.com

## **Barbara A. Healy, Investment Adviser Representative**

**Year of Birth:** 1951

**Education:** Northern Illinois University – BA, 1973  
DePaul University – MBA, 1976

**Professional Designation(s):** Certified Financial Planner (CFP), Certified Fund Specialist (CFS), Accredited Investment Fiduciary (AIF), Certified Retirement Counselor (CRC),

### **Employment for the Past Five Years:**

Employment Dates: 07/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 06/2007 to Present  
Firm Name: SST Benefits Consulting & Insurance Services, Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 04/2008 to 01/2015  
Firm Name: CUNA Mutual Insurance Company  
Type of Business: Mutual Insurance Company  
Job Title & Duties: Retirement Sales Specialist

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Barbara A. Healy has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Barbara A. Healy is independently licensed as an insurance agent and may sell insurance products to clients and receive commissions when doing so. This is a potential conflict of interest, since commissions earned could be in addition to Advisory fees earned in her capacity as an Investment Adviser representative. Clients are never obligated or required to purchase insurance products from or through Ms. Healy and may select any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

### **Item 5 - Additional Compensation**

Barbara A. Healy does receive additional compensation from the Advisory fees disclosed in the SST Benefits Consulting & Insurance Services, Inc. Disclosure Brochure and the insurance commissions previously described. In the course of business Barbara A. Healy does not receive economic benefit from non-clients for providing Advisory services.

**Item 6 - Supervision**

Barbara A. Healy is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:

PHONE 949.460.9898 x 254;

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **David Heroux, Investment Adviser Representative**

**Year of Birth:** 1959

**Education:** University of Colorado, Boulder CO, Bachelor of Science, 1981

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	05/2015 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	05/2015 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	03/2009 to 05/2015
Firm Name:	Campbells Admin
Type of Business:	Administrative Services
Job Title & Duties:	President/Owner

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, David Heroux has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

David Heroux is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through David Heroux.

### **Item 5 - Additional Compensation**

In the course of business David Heroux does not receive economic benefit from non-clients for providing Advisory services. David Heroux may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

David Heroux is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Emily Hing, Investment Adviser Representative**

**Year of Birth:** 1986

**Education:** San Diego State University with BA in Finance, 2008

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 05/2011 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 05/2011 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer and Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Emily Hing has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Emily Hing is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Emily Hing.

### **Item 5 - Additional Compensation**

In the course of business Emily Hing does not receive economic benefit from non clients for providing Advisory services. Emily Hing may receive compensation in connection with her registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Emily Hing is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.  
Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL joel.shapiro@nfp.com



## **Kameron Jones, Investment Adviser Representative**

**Year of Birth:** 1990

**Education:** University of Pennsylvania, BA Philosophy, Political Science and Economics, 2012

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	06/2012 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	09/1995 – 06/2012
Firm Name:	Student
Type of Business:	College
Job Title & Duties:	Student

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Kameron Jones has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Kameron Jones is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Kameron Jones.

### **Item 5 - Additional Compensation**

In the course of business Kameron Jones does not receive economic benefit from a person or entity who is not a client for providing Advisory services. Kameron Jones may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 – Supervision**

Kameron Jones is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Alex B. Kahn, Investment Adviser Representative**

**Year of Birth:** 1992

**Education:** The University of Pennsylvania

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	6/2015 to Present
Firm Name:	FlexPATH Strategies
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	June 2014 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	June 2014 to 03/2017
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	Student from 2006 to 2014
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### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Alex Kahn has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

In addition to his responsibilities at NFP Retirement Inc., Alex Kahn is an Investment Adviser Representative of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients. Clients are under no obligation to purchase securities or Advisory services through Alex Kahn.

### **Item 5 - Additional Compensation**

Alex Kahn's compensation is derived from flexPATH Strategies LLC.

### **Item 6 - Supervision**

Alex Kahn is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254; EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Daniel Kallus, Investment Adviser Representative**

**Year of Birth:** 1970

**Education:** University of Houston, College of Business Administration  
M.B.A., June 1997, Finance  
B.B.A., May 1993, Finance, Summa Cum Laude

**Designation(s):** Chartered Financial Analyst (CFA)

### **Employment for the Past Five Years:**

Employment Dates:	06/2014 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	06/2014 to 04/2017
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	03/1997 – 06/2014
Firm Name:	Garcia Hamilton & Assoc.
Type of Business:	Investment Adviser
Job Title & Duties:	Portfolio Manager

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Daniel Kallus has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Daniel Kallus. Daniel Kallus is the owner of Sunshine Shore, a vacation home in rental program.

### **Item 5 - Additional Compensation**

In the course of business Daniel Kallus does not receive economic benefit from a person or entity who is not a client for providing Advisory services

### **Item 6 - Supervision**

Daniel Kallus is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254
	EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>

## Geoffrey Keeling, Investment Adviser Representative

**Year of Birth:** 1971

**Education:** University of Texas, BBA

**Professional Designation(s):** Chartered Financial Analyst (CFA)

CFA - Chartered Financial Analyst	
Designation	Chartered Financial Analyst
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CFA
Issuing Organization	CFA Institute
Prerequisites/Experience Required	Candidate must meet one of the following requirements: Undergraduate degree and four years of professional experience involving investment decision-making, or Four years qualified work experience (full time, but not necessarily investment related)
Educational Requirements	Self-study program (250 hours of study for each of the three levels)
Examination Type	Three course exams
Continuing Education/Experience Requirements	None

### Employment for the Past Five Years:

Employment Dates: 11/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 11/2014 to 02/14/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 07/10/12 to 01/2014  
Firm Name: Econserve, LLC  
Type of Business: Water Conservation Company  
Job Title & Duties: Independent Contractor

Employment Dates: 06/2010 to 12/2012  
Firm Name: Twinhawk Capital  
Type of Business: Financial Institution  
Job Title & Duties: Founder, Senior Portfolio Manager

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Geoffrey Keeling has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Geoffrey Keeling.

### **Item 5 - Additional Compensation**

In the course of business Geoffrey Keeling does not receive economic benefit from non-clients for providing Advisory services.

### **Item 6 – Supervision**

Geoffrey Keeling is supervised by Jeff Elvander, Chief Investment Officer.

Jeff Elvander's information:

PHONE 949.460.9898 x 238  
EMAIL [jeff.elvander@nfp.com](mailto:jeff.elvander@nfp.com)

## **Richard Kruse, Investment Adviser Representative**

**Year of Birth:** 1953

**Education:** University of Minnesota B.A, Business Communication, 1975 - 1984

**Professional Designation(s):** Certified Public Accountant (CPA), Chartered Financial Consultant (Chfc), Certified Life Underwriter (CLU)

### **Employment for the Past Five Years:**

Employment Dates: 04/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 11/2003 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 10/1984 to Present  
Firm Name: NFP Corporate Services, (MN)  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: President

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Richard Kruse has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Richard Kruse is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Richard Kruse.

### **Item 5 - Additional Compensation**

In the course of business Richard Kruse does not receive economic benefit from non clients for providing Advisory services. Richard Kruse may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Richard Kruse is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Christopher David Langstaff, Investment Adviser Representative**

**Year of Birth:** 1989

**Education:** Chapman University, Orange, CA, 2010

**Professional Designation(s):** Chartered Financial Analyst (CFA)

### **Employment for the Past Five Years:**

Employment Dates: 03/2015 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2015 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 05/2010 to 03/2013  
Firm Name: Direct Drives and Controls  
Type of Business: Financial Institution  
Job Title & Duties: Accounting/Marketing Representative

Employment Dates: 03/2012 to 10/2012  
Firm Name: Osnabruck Tigers  
Type of Business: Professional Football Team  
Job Title & Duties: Professional Football Player

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Christopher Langstaff has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Christopher Langstaff is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Christopher Langstaff.

### **Item 5 - Additional Compensation**

In the course of business Christopher Langstaff does not receive economic benefit from non-clients for providing Advisory services. Christopher Langstaff may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Christopher Langstaff is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

**Bradley L. Larsen, Investment Adviser Representative**

**Year of Birth:** 1963

**Education:** University of Florida - Bachelor of Science in Business Administration/Marketing, 1985

**Professional Designation(s):**

**Employment for the Past Five Years:**

Employment Dates:	03/2016 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	06/2009 to 03/2016
Firm Name:	ERISA Fiduciary Advisers, Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Owner

**Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Bradley Larsen has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

**Item 4 - Other Business Activities**

Bradley Larsen is not currently engaged in any business or occupation for compensation in the financial industry or otherwise that provides a substantial source of income to Bradley Larsen or involves a substantial amount of Bradley Larsen's time.

**Item 5 - Additional Compensation**

In the course of business Bradley Larsen does not receive economic benefit from non clients for providing Advisory services.

**Item 6 - Supervision**

Bradley Larsen is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254 EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>
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## **Vincent Learned, Investment Adviser Representative**

**Year of Birth:** 1977

**Education:** University of Hawaii, BBA 1999, University of Hawaii, Honolulu, MBA, 2003

**Professional Designation(s):** Chartered Financial Analyst (CFA), Certified Financial Planner (CFP)

### **Employment for the Past Five Years:**

Employment Dates: 12/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 12/2014 to 07/31/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 11/2013 to 12/2014  
Firm Name: Unionbanc Investment Services  
Type of Business: Financial Institution  
Job Title & Duties: Sr. Financial Adviser

Employment Dates: 11/2012 to 11/2013  
Firm Name: Central Pacific Bank  
Type of Business: Financial Institution  
Job Title & Duties: Vice President

Employment Dates: 02/2011 to 11/2012  
Firm Name: Wells Fargo Advisers  
Type of Business: Financial Institution  
Job Title & Duties: Financial Adviser

Employment Dates: 06/2012 to 01/2011  
Firm Name: Bancwest Investment Services  
Type of Business: Financial Institution  
Job Title & Duties: VP, Wealth Adviser

Employment Dates: 01/2010 to 06/2010  
Firm Name: Merrill Lynch  
Type of Business: Financial Institution  
Job Title & Duties: Financial Adviser

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Vincent Learned has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

#### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Vincent Learned.

#### **Item 5 - Additional Compensation**

In the course of business Vincent Learned does not receive economic benefit from non-clients for providing Advisory services.

#### **Item 6 - Supervision**

Vincent Learned is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)



## John L. Livingston, Investment Adviser Representative

**Year of Birth:** 1961

**Education:** B.S.B.A. – Marketing; University of Missouri-Columbia, 1983

**Professional Designation(s):** Certified Investment Management Analyst (CIMA), Certified Financial Planner (CFP®)

<b>CIMA - Certified Investment Management Analyst</b>	
Designation	Certified Investment Management Analyst
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CIMA
Issuing Organization	<u>Investment Management Consultants Association</u>
Prerequisites/Experience Required	Candidate must meet <u>all</u> of the following requirements: Three years of verifiable financial services experience; Must answer "no" to all disclosure questions on Form U-4 that cover criminal and regulatory violations, civil judicial actions and customer complaints or else satisfactorily justify a "yes" answer
Educational Requirements	Candidate must complete the following: <u>Self study education (approximately five months)</u> One-week classroom education program provided by an AACSB accredited university business school
Examination Type	On-line qualification examination after self study and an on-line comprehensive certification examination after meeting all requirements of a registered classroom education program.
Continuing Education/Experience Requirements	40 hours every two years

<b>CFP - Certified Financial Planner</b>	
Designation	Certified Financial Planner
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CFP
Issuing Organization	<u>Certified Financial Planner Board of Standards, Inc.</u>
Prerequisites/Experience Required	Candidate must meet the following requirements: A bachelor's degree (or higher) from an accredited college or university and three years of full-time

	personal financial planning experience
Educational Requirements	Candidate must complete a CFP-board registered program, or hold one of the following: CPA, ChFC, CLU, CFA, Ph.D. in business or economics, Doctor of Business Administration, Attorney's License
Examination Type	CFP Certification Examination
Continuing Education/Experience Requirements	30 hours every two years

### Employment for the Past Five Years:

Employment Dates: 10/2009 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 10/2009 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 04/2006 to 07/2009  
Firm Name: Mercer Outsourcing  
Type of Business: Service Provider  
Job Title & Duties: Business Development Leader

### Items 3 & 7 - Disciplinary Information

As it relates to past, current or prospective clients, John L. Livingston has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### Item 4 - Other Business Activities

John L. Livingston is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through John L. Livingston.

### Item 5 - Additional Compensation

In the course of business John L. Livingston does not receive economic benefit from non clients for providing Advisory services. John L. Livingston may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

John L. Livingston is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

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## **Brandon Mattechcheck, Investment Adviser Representative**

**Year of Birth:** 08/14/1988

**Education:** Bachelor of Science (B.S.), Finance, General

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 01/2017 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Registered Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 11/2016 to Present  
Firm Name: NFP Corporate  
Type of Business: Registered Investment Advisor  
Job Title & Duties: Independent Insurance Agent

Employment Dates: 05/2015 to 12/2016  
Firm Name: Cambridge Investment Research Advisers, Inc.  
Type of Business: Registered Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2014 to 12/2016  
Firm Name: Cambridge Investment Research, Inc.  
Type of Business: Broker Dealer  
Job Title & Duties: Registered Representative

Employment Dates: 04/2014 to 08/2014  
Firm Name: Financial Telesis, Inc.  
Type of Business: Broker Dealer  
Job Title & Duties: Registered Representative

Employment Dates: 02/2014 to 11/2016  
Firm Name: Mattechcheck and Associates  
Type of Business: Insurance Agency  
Job Title & Duties: Account Representative

Employment Dates: 10/2012 to 02/2014  
Firm Name: J.P. Morgan Securities, LLC  
Type of Business: Financial Institution  
Job Title & Duties: Registered Representative

Employment Dates: 10/2011 to 02/2014  
Firm Name: JPMorgan Chase Bank  
Type of Business: Financial Institution  
Job Title & Duties: Personal Banker

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Brandon Mattechcheck has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory

organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

#### **Item 4 - Other Business Activities**

Brandon Mattechek is not currently engaged in any business or occupation for compensation in the financial industry or otherwise that provides a substantial source of income to Brandon Mattechek or involves a substantial amount of Brandon Mattechek time.

#### **Item 5 - Additional Compensation**

In the course of business Brandon Mattechek does not receive economic benefit from a person or entity who is not a client for providing Advisory services.

#### **Item 6 - Supervision**

Brandon Mattechek is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Michael T. McGuire, Investment Adviser Representative**

**Year of Birth:** 1964

**Education:** Iowa State University –Bachelor of Business Administration – Marketing, 1986

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	10/2003 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	10/2004 to 07/2014
Firm Name:	Financial Telesis Inc.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Michael T. McGuire has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Michael T. McGuire is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Michael T. McGuire.

### **Item 5 - Additional Compensation**

In the course of business Michael T. McGuire does not receive economic benefit from non clients for providing Advisory services. Michael T. McGuire may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Michael T. McGuire is supervised by Joel Shapiro Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254
	EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>

## **Natalie Meziere, Investment Adviser Representative**

**Year of Birth:** 1987

**Education:** University of California, Merced, CA, 2011

### **Employment for the Past Five Years:**

Employment Dates: 10/2011 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 01/2015 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 09/2007 to 10/2011  
Firm Name: Robbins Brothers  
Type of Business: Retail  
Job Title & Duties: Office Assistant

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Natalie Meziere has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Natalie Meziere is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Natalie Meziere.

### **Item 5 - Additional Compensation**

In the course of business Natalie Meziere does not receive economic benefit from non-clients for providing Advisory services. Natalie Meziere may receive compensation in connection with her registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Natalie Meziere is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Elizabeth Mikkelson, Investment Adviser Representative**

**Year of Birth:** 1961

**Education:** University of California, Santa Barbara, CA

### **Employment for the Past Five Years:**

Employment Dates: 03/2015 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2015 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 03/2013 to 03/2015  
Firm Name: Meridian Retirement Plan Adviser  
Type of Business: Financial Institution  
Job Title & Duties: Director, Client Services

Employment Dates: 01/2008 to 03/2013  
Firm Name: Hub International  
Type of Business: Investment Adviser  
Job Title & Duties: Senior Plan Consultant

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Elizabeth Mikkelson has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Elizabeth Mikkelson is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Elizabeth Mikkelson.

### **Item 5 - Additional Compensation**

In the course of business Elizabeth Mikkelson does not receive economic benefit from non-clients for providing Advisory services. Elizabeth Mikkelson may receive compensation in connection with her registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Elizabeth Mikkelson is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Thomas Miller, Investment Adviser Representative**

**Year of Birth:** 1964

**Education:** Augsburg College, B.A. - Business Management and Economics, 1982 - 1986

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 11/2003 to present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 07/1999 to present  
Firm Name: Partners Securities, Inc.  
Type of Business: Financial Institution  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/1991 to present  
Firm Name: NFP Corporate Services, (MN)  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Director of Marketing

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Thomas Miller has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Thomas Miller is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Thomas Miller.

### **Item 5 - Additional Compensation**

In the course of business Thomas Miller does not receive economic benefit from non clients for providing Advisory services. Thomas Miller may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Thomas Miller is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Brennan Moore, Investment Adviser Representative**

**Year of Birth:** 1985

**Education:** Colby College, Waterville, ME, 2007

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 03/2015 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2015 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 08/2007 to 03/2015  
Firm Name: Guardian Investor Services, LLC  
Type of Business: Financial Institution  
Job Title & Duties: Regional Sales Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Brennan Moore has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Brennan Moore is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Brennan Moore.

### **Item 5 - Additional Compensation**

In the course of business Brennan Moore does not receive economic benefit from non-clients for providing Advisory services. Brennan Moore may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Brennan Moore is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.  
Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **John Nelson, Investment Adviser Representative**

**Year of Birth:** 1955

**Education:** Loyola Law School, Los Angeles, J.D. 1980

### **Employment for the Past Five Years:**

Employment Dates: 03/2015 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2015 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 08/2013 to 03/2015  
Firm Name: Independent Financial Partners.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 12/1996 to 03/2015  
Firm Name: Law Offices of John R. Nelson.  
Type of Business: Law Office  
Job Title & Duties: Owner & Sole Proprietor

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, John Nelson has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

John Nelson is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through John Nelson.

### **Item 5 - Additional Compensation**

In the course of business John Nelson does not receive economic benefit from non-clients for providing Advisory services. John Nelson may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

John Nelson is supervised by Nicholas D. Della Vedova, President.

Nicholas D. Della Vedova's contact information: PHONE 949.460.9898 x 246  
EMAIL [nick.dellavedova@nfp.com](mailto:nick.dellavedova@nfp.com)

## **Michael Nesheim, Investment Adviser Representative**

**Year of Birth:** 1970

**Education:** The Masters College, Santa Clarita CA  
B.A. Business Management - 1992  
M.A. Biblical Counseling - 2010

### **Employment for the Past Five Years:**

Employment Dates: 01/2015 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 06/1998 to Present  
Firm Name: Michael T. Rezinis Insurance Services, Inc.  
Type of Business: Insurance Services  
Job Title & Duties: Partner

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Michael Nesheim has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Michael Nesheim is currently involved with Access Benefits, Inc. an Insurance Company and Medical Box, LLC.

### **Item 5 - Additional Compensation**

In the course of business Michael Nesheim does not receive economic benefit from non-clients for providing Advisory services.

### **Item 6 - Supervision**

Michael Nesheim is supervised by Nicholas D. Della Vedova, President.

Nicholas D. Della Vedova's contact information: PHONE 949.460.9898 x 246  
EMAIL [nick.dellavedova@nfp.com](mailto:nick.dellavedova@nfp.com)

## **Sandra B. Oakes, Investment Adviser Representative**

**Year of Birth:** 1974

**Education:** Taijegymnasiet, Sweden - 1994 Economy Program

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	07/2016 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/1997 to Present
Firm Name:	SST Benefits Consulting & Insurance Services, Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Sandra B. Oakes has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Sandra B. Oakes is independently licensed as an insurance agent and may sell insurance products to clients and receive commissions when doing so. This is a potential conflict of interest, since commissions earned could be in addition to Advisory fees earned in her capacity as an Investment Adviser representative. Clients are never obligated or required to purchase insurance products from or through Ms. Oakes and may select any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

### **Item 5 - Additional Compensation**

Sandra B. Oakes does not receive any additional compensation beyond the Advisory fees disclosed in the SST Benefits Consulting & Insurance Services, Inc. Disclosure Brochure and the insurance commissions previously described.

### **Item 6 - Supervision**

Sandra B. Oakes is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254 EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>
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## **Kyle Olson, Investment Adviser Representative**

**Year of Birth:** 1987

**Education:** Fullerton College, 2008  
University of Pennsylvania/Wharton, Bachelors of Arts Economics, 2010

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 02/2011 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to 03/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 06/2011 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Kyle Olson has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Kyle Olson.

### **Item 5 - Additional Compensation**

In the course of business Kyle Olson does not receive economic benefit from non clients for providing Advisory services.

### **Item 6 - Supervision**

Kyle Olson is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.  
Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Frederick Pieracci, Investment Adviser Representative**

**Year of Birth:** 1942

**Education:** St. Francis High School

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	11/2016 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	04/2016 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	03/1978 to present
Firm Name:	Cape Star Company.
Type of Business:	Insurance Company
Job Title & Duties:	Director

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Frederick Pieracci has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Frederick Pieracci is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Frederick Pieracci.

### **Item 5 - Additional Compensation**

In the course of business Frederick Pieracci does not receive economic benefit from non clients for providing Advisory services. Frederick Pieracci may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Frederick Pieracci is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## Paul Powell, Investment Adviser Representative

**Year of Birth:** 1971

**Education:** Troy University, BS – Accounting/Business Admin, 1990 - 1994

**Professional Designation(s):** Certified 401(k) Professional (C(k)P)

C(k)P- Certified 401(k) Professional	
Designation	Certified 401(k) Professional
Designation Status	Currently offered and recognized by the issuing organization
Acronym	C(k)P
Issuing Organization	The Retirement Adviser University at UCLA Anderson School of Management Executive Education (TRAU)
Prerequisites/Experience Required	Three years' experience in financial services
Educational Requirements	Approximately 142 hours of coursework
Examination Type	Final Exam for each course, online Mastery Curriculum Exam, online Candidate Designation Exam, online and proctored

### Employment for the Past Five Years:

Employment Dates: 01/2015 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to 07/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 2010 to Present  
Firm Name: Southeastern Logistics, LLC.  
Type of Business: Motor Carrier  
Job Title & Duties: Owner/President

Employment Dates: 01/2008 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer  
Job Title & Duties: Registered Representative

### Items 3 & 7 - Disciplinary Information

This supervised person has a disciplinary history, the details of which can be found on FINRA's Broker Check system. Broker Check is a free tool to help investors research the professional backgrounds of current and former FINRA-registered brokers. Through Broker Check, investors can search for

brokers and obtain online delivery of a background report. To access FINRA's Broker Check system go to [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

#### **Item 4 - Other Business Activities**

Paul Powell is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Paul Powell.

Owner and President of Southeastern Logistics, LLC – Started December 2010 – Family Structured

#### **Item 5 - Additional Compensation**

In the course of business Paul Powell does not receive economic benefit from non clients for providing Advisory services. Paul Powell may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

No additional compensation is currently being received in regards to the trucking company listed above.

#### **Item 6 – Supervision**

Paul Powell is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Steven L. Prom, Investment Adviser Representative**

**Year of Birth:** 1973

**Education:** St. Cloud State University - B. S. Finance  
DePaul University - M.S. Finance

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2010 to Present  
Firm Name: Kestra Financial Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 07/2010 to present  
Firm Name: NFP Corporate Services, (MN)  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Steven Prom has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Steven Prom is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Steven Prom.

### **Item 5 - Additional Compensation**

In the course of business Steven Prom does not receive economic benefit from non clients for providing Advisory services. Steven Prom may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Steven Prom is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Kimberly Dawn Pruitt, Investment Adviser Representative**

**Year of Birth:** 1982

**Education:** University of Phoenix, Business Management. 2006

**Professional Designation(s):** Certified 401(k) Professional (C(k)P)

### **Employment for the Past Five Years:**

Employment Dates:	07/2015 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	06/2014 to 03/2017
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	03/2009 to 06/2014
Firm Name:	Monolith Retirement.
Type of Business:	Financial Institution
Job Title & Duties:	Financial Adviser

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Kimberly Pruitt has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Kimberly Pruitt.

### **Item 5 - Additional Compensation**

In the course of business Kimberly Pruitt does not receive economic benefit from non-clients for providing Advisory services.

### **Item 6 – Supervision**

Kimberly Pruitt is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254 EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>
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## Brian Roberts, Investment Adviser Representative

**Year of Birth:** 1969

**Education:** Davidson College; B.A. Economics with honors, 1982-86

**Professional Designation(s):** Chartered Financial Analyst – CFA®. 1993

CFA - Chartered Financial Analyst	
Designation	Chartered Financial Analyst
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CFA
Issuing Organization	CFA Institute
Prerequisites/Experience Required	Candidate must meet one of the following requirements: Undergraduate degree and four years of professional experience involving investment decision-making, or Four years qualified work experience (full time, but not necessarily investment related)
Educational Requirements	Self-study program (250 hours of study for each of the three levels)
Examination Type	Three course exams
Continuing Education/Experience Requirements	None

## Employment for the Past Five Years:

Employment Dates: 02/2011 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 01/2011 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 10/2009 – 11/2011  
Firm Name: Areté Investment Consulting  
Type of Business: Consulting  
Job Title & Duties: Owner

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Brian Roberts has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Brian Roberts is not currently engaged in any business or occupation for compensation in the financial industry or otherwise that provides a substantial source of income to Brian Roberts or involves a substantial amount of Brian Roberts's time.

### **Item 5 - Additional Compensation**

In the course of business Brian Roberts does not receive economic benefit from non-clients for providing Advisory services.

### **Item 6 - Supervision**

Brian Roberts is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **James R. Sarych, Investment Adviser Representative**

**Year of Birth:** 1966

**Education:** University of St. Thomas, B. A. Finance, 1984 - 1988

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/16/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 01/1998 to present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 01/1992 to Present  
Firm Name: NFP Corporate Services, (MN).  
Type of Business: Financial Institution  
Job Title & Duties: Executive VP and Director/Senior Consultant

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, James Sarych has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

James Sarych is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through James Sarych.

### **Item 5 - Additional Compensation**

In the course of business James Sarych does not receive economic benefit from non clients for providing Advisory services. James Sarych may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

James Sarych is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Sauerman, Richard, Investment Adviser Representative**

**Year of Birth:** 1984

**Education:** Bachelor of Science, Samford University

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 06/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2016 to 06/2016  
Firm Name: Rabobank Nederland  
Type of Business: Wholesale Bank  
Job Title & Duties: Credit Analyst

Employment Dates: 06/2011 to 03/2015  
Firm Name: Quadrant Real Estate Advisers LLC  
Type of Business: Investment Adviser  
Job Title & Duties: Head of Global Research, Portfolio Manager

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Richard Sauerman has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Richard Sauerman is not currently engaged in any business or occupation for compensation in the financial industry or otherwise that provides a substantial source of income to Richard Sauerman or involves a substantial amount of Richard Sauerman time.

### **Item 5 - Additional Compensation**

In the course of business Richard Sauerman does not receive economic benefit from a person or entity who is not a client for providing Advisory services.

### **Item 6 - Supervision**

Richard Sauerman is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Peter J. Schmitz, Investment Adviser Representative**

**Year of Birth:** 1974

**Education:** University of Minnesota, Twin Cities – B.S. Finance, 1993-1998

**Professional Designation(s):** Chartered Financial Analyst (CFA), Certified Financial Planner (CFP)

### **Employment for the Past Five Years:**

Employment Dates: 04/16/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 02/2016 to present  
Firm Name: Kestra Financial Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 01/2016 to present  
Firm Name: NFP Corporate Services, (MN).  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Relationship Manager

Employment Dates: 01/2014 to 01/2016  
Firm Name: Cambridge Investment Research, Inc.  
Type of Business: Financial Institution  
Job Title & Duties: Registered Representative

Employment Dates: 11/2013 to 01/2016  
Firm Name: Stiles Financial Services, Inc.  
Type of Business: Financial Institution  
Job Title & Duties: Investment Adviser

Employment Dates: 07/2013 to 11/2013  
Firm Name: Bank of America, N.A.  
Type of Business: Financial Institution  
Job Title & Duties: Financial Adviser

Employment Dates: 10/2011 to 11/2013  
Firm Name: Merrill Lynch, Pierce, Fenner & Smith Inc.  
Type of Business: Financial Institution  
Job Title & Duties: Financial Adviser

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Peter Schmitz has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings. Peter Schmitz has filed CH 7 Bankruptcy in May 2010.

#### **Item 4 - Other Business Activities**

Peter Schmitz is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Peter Schmitz.

#### **Item 5 - Additional Compensation**

In the course of business Peter Schmitz does not receive economic benefit from non clients for providing Advisory services. Peter Schmitz may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

#### **Item 6 - Supervision**

Peter Schmitz is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Stuart Scholten, Investment Adviser Representative**

**Year of Birth:** 1990

**Education:** Thomas Edison State College, BS Business Administration and Management, General, 2012

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	09/2012 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	09/2012 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	06/2010 – 09/2012
Firm Name:	Marriott Hotels
Type of Business:	Leisure Industry
Job Title & Duties:	Front Desk Agent

Employment Dates:	09/1995 – 06/2012
Job Title & Duties:	Student

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Stuart Scholten has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Stuart Scholten is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Stuart Scholten.

### **Item 5 - Additional Compensation**

In the course of business Stuart Scholten does not receive economic benefit from non-clients for providing Advisory services. Stuart Scholten may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 – Supervision**

Stuart Scholten is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:      PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Joel Shapiro, Senior Vice President - ERISA Compliance**

**Year of Birth:** 1969

### **Education:**

- Tufts University, BA 1991
- Washington College of Law, at the American University, Juris Doctor J.D. 1994
- Georgetown University Law Center, Master of Laws LLM. 1995

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	02/2006 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative
Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative
Employment Dates:	1/2015 to Present
Firm Name:	FlexPATH Strategies
Type of Business:	Investment Adviser
Job Title & Duties:	Senior Vice President - ERISA Compliance
Employment Dates:	09/2016 to Present
Firm Name:	SST Benefits Consulting & Insurance Services, Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Senior Vice President - ERISA Compliance
Employment Dates:	02/2006 to 07/2014
Firm Name:	Financial Telesis Inc.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Joel Shapiro has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Joel Shapiro is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Joel Shapiro.

Joel Shapiro is a principal of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

### **Item 5 - Additional Compensation**

In the course of business Joel Shapiro does not receive economic benefit from a person or entity who is not a client for providing Advisory services. Joel Shapiro may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Joel Shapiro is supervised by Nicholas D. Della Vedova, President. Nicholas D. Della Vedova's contact information:

PHONE 949.460.9898 x 246; EMAIL

[nick.dellavedova@nfp.com](mailto:nick.dellavedova@nfp.com)

## **Jill Shea, Investment Adviser Representative**

**Year of Birth:** 1970

**Education:** Scripps College of Claremont, BA International Relations, 1992

**Professional Designation(s):** Certified Employee Benefit Specialist (CEBS)

### **Employment for the Past Five Years:**

Employment Dates: 04/2013 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 03/2010 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 12/2007 – 03/2010  
Firm Name: NRP Advisers  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Jill Shea has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Jill Shea is a registered representative and an investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Jill Shea.

### **Item 5 - Additional Compensation**

In the course of business Jill Shea does not receive economic benefit from non clients for providing Advisory services. Jill Shea may receive compensation in connection with her registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 – Supervision**

Jill Shea is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Peter Alexander Snow, Investment Adviser Representative**

**Year of Birth:** 1976

**Education:** Colorado State University, B.A. Economics  
University of St. Thomas, MBA, Finance/Entrepreneurship

**Professional Designation(s):** Certified Financial Planner (CFP)

### **Employment for the Past Five Years:**

Employment Dates:	04/16/2016 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	11/2006 to present
Firm Name:	Kestra Financial Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	11/2006 to present
Firm Name:	NFP Corporate Services, (MN).
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Investment Adviser Rep/Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Peter Snow has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Peter Snow is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Peter Snow.

### **Item 5 - Additional Compensation**

In the course of business Peter Snow does not receive economic benefit from non clients for providing Advisory services. Peter Snow may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Peter Snow is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **John Spach, Investment Adviser Representative**

**Year of Birth:** 1968

**Education:** California State Northridge, Kinesiology, 1991

**Professional Designation(s):** Certified 401(k) Professional C(k)P

### **Employment for the Past Five Years:**

Employment Dates: 04/2017 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 05/2007 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 06/1997 to Present  
Firm Name: Spach Financial  
Type of Business: Consulting  
Job Title & Duties: President

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, John Spach has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

John Spach is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through John Spach. John Spach is currently involved with Board Member of Oaks Christian School, a nonprofit organization/charity, is the owner of Erisa Smart, a Private Corporation & Consulting firm, is teaching on topics of plan administration and best practices at The Plan Sponsor University and is involved with The Retirement Adviser University in research and education.

### **Item 5 - Additional Compensation**

In the course of business John Spach does not receive economic benefit from non clients for providing Advisory services. John Spach may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 – Supervision**

John Spach is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:  
PHONE 949.460.9898 x 254 ;  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **David Stecher, Investment Adviser Representative**

**Year of Birth:** 1961

**Education:** University of Delaware, BS in Accounting

**Designation(s):** Certified Financial Planner (CFP)  
Chartered Life Underwriter (CLU)  
Chartered Financial Consultant (ChFC)

### **Employment for the Past Five Years:**

Employment Dates: 01/2012 to Present  
Firm Name: NFP Retirement, Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 12/2009 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 09/2009 to 12/2009  
Firm Name: FAS Corp.  
Type of Business: Broker Dealer  
Job Title & Duties: Registered Representative

Employment Dates: 04/2004 to 09/2009  
Firm Name: Retirement Capital Group  
Type of Business: Consulting  
Job Title & Duties: Senior Vice President - Consulting

### **Items 3 & 7 - Disciplinary Information**

The following DRPs are reported on David Stecher:

- In relation to David Stecher's arrest on 10/09/1998, 1 count of misdemeanor theft was dropped after Mr. Stecher participated in a "First Offenders" program. After participation, Mr. Stecher was not required to enter a plea for this non-investment related charge. Documentation sent to FINRA on 05/02/08 from Camden County, New Jersey.
- IRS Tax Lien filed in 2/17/2011 - current installment arrangement with IRS to pay off the tax liability.
- New York Insurance Department – Violation of Section 2117 of the New York Insurance law; Solicitation and /or sale of an insurance policy for Equitable of Colorado, Inc. is not licensed to do business in New York – resolved in 1996 with a \$500.00 fine.

### **Item 4 - Other Business Activities**

David Stecher is a registered representative and an investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through David Stecher. David Stecher also is appointed with insurance carriers (Axa/Equitable,

Metlife, John Hancock, Pacific Life) through which in the course of his business he occasionally sells fixed insurance products. David Stecher is the owner and President of Stecher Capital, Inc. Stecher Capital, Inc. provides administrative services and non-securities or investment related consulting services. David receives a small salary. David Stecher is an owner and officer of LS Consulting, Inc. LS Consulting, Inc. provides administrative and accounting/bookkeeping services for its clients and is not receiving any compensation at this time. He may receive a small salary in the future.

### **Item 5 - Additional Compensation**

In the course of business David Stecher does not receive economic benefit from non-clients for providing Advisory services. David Stecher may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

David Stecher is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:      PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Solomon Stewart, Investment Adviser Representative**

**Year of Birth:** 1984

**Education:** MS in Financial Analysis and Investment Management from St. Mary's College of California, BS in Finance from the University of Arizona

**Professional Designation(s):** Chartered Financial Analyst (CFA)

### **Employment for the Past Five Years:**

Employment Dates: 04/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 04/2010 to 07/2013  
Firm Name: Blackrock  
Type of Business: Investment Adviser  
Job Title & Duties: Associate

Employment Dates: 12/2007 to 04/2010  
Firm Name: RCM Capital Management  
Type of Business: Investment Adviser  
Job Title & Duties: Consultant Data Specialist

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Solomon Stewart has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Solomon Stewart is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Solomon Stewart.

### **Item 5 - Additional Compensation**

In the course of business Solomon Stewart does not receive economic benefit from non clients for providing Advisory services. Solomon Stewart may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 – Supervision**

Solomon Stewart is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Orlando Torres, Senior Adviser Representative**

**Year of Birth:** 1980

**Education:** California State University Long Beach; Bachelor in Finance Professional, 2004

**Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	03/2007 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/2014 to Present
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	03/2007 to 07/2014
Firm Name:	Financial Telesis Inc.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Orlando Torres has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Orlando Torres is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Orlando Torres.

### **Item 5 - Additional Compensation**

In the course of business Orlando Torres does not receive economic benefit from non clients for providing Advisory services. Orlando Torres may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Orlando Torres is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254
	EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>

## **Roberta Tugaw, Investment Adviser Representative**

**Year of Birth:** 1954

**Education:** California State University, Sacramento – Bachelor of Art, 1978

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 07/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 10/1997 to Present  
Firm Name: SST Benefits Consulting & Insurance Services, Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Roberta Tugaw has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Roberta A. Tugaw is independently licensed as an insurance agent and may sell insurance products to clients and receive commissions when doing so. This is a potential conflict of interest, since commissions earned could be in addition to Advisory fees earned in her capacity as an Investment Adviser representative. Clients are never obligated or required to purchase insurance products from or through Ms. Tugaw and may select any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

### **Item 5 - Additional Compensation**

Roberta A. Tugaw does not receive any additional compensation beyond the Advisory fees disclosed in the SST Benefits Consulting & Insurance Services, Inc. Disclosure Brochure and the insurance commissions previously described.

### **Item 6 - Supervision**

Roberta Tugaw is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **William Tugaw, Investment Adviser Representative**

**Year of Birth:** 1950

**Education:** Arizona State University, W.P. Carey School of Business  
Bachelor of Science Degree in Business Administration

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	03/2016 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	10/1997 to Present
Firm Name:	SST Benefits Consulting & Insurance Services, Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, William Tugaw has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

William J. Tugaw is President and a part owner of Dover Enterprises, a software/web development company. It is not an investment related business and he spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

He is also independently licensed as an insurance agent and may sell insurance products to clients and receive commissions when doing so. This is a potential conflict of interest, since commissions earned could be in addition to Advisory fees earned in his capacity as an Investment Adviser representative. Clients are never obligated or required to purchase insurance products from or through Mr. Tugaw and may select any independent insurance agent and insurance company to purchase insurance products.

### **Item 5 - Additional Compensation**

William J. Tugaw does not receive any additional compensation beyond the Advisory fees disclosed in the SST Benefits Consulting & Insurance Services, Inc. Disclosure Brochure and in Other Business Activities above.

### **Item 6 - Supervision**

William Tugaw is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:

PHONE 949.460.9898 x 254;  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Michael V. Viljak, Investment Adviser Representative**

**Year of Birth:** 1947

**Education:** BS Psychology C.W. Post of Long Island University, 1969

**Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates:	10/2002 to Present
Firm Name:	NFP Retirement Inc.
Type of Business:	Investment Adviser
Job Title & Duties:	Investment Adviser Representative

Employment Dates:	07/2014 to 03/2017
Firm Name:	Kestra Investment Services, LLC.
Type of Business:	Broker Dealer/Investment Adviser
Job Title & Duties:	Registered Representative

Employment Dates:	12/2004 to 07/2014
Firm Name:	Financial Telesis Inc.
Type of Business:	Broker Dealer and Investment Adviser
Job Title & Duties:	Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Michael V. Viljak has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Michael V. Viljak.

### **Item 5 - Additional Compensation**

In the course of business Michael V. Viljak does not receive economic benefit from non clients for providing Advisory services.

### **Item 6 - Supervision**

Michael V. Viljak is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:	PHONE 949.460.9898 x 254
	EMAIL <a href="mailto:joel.shapiro@nfp.com">joel.shapiro@nfp.com</a>

## **Julie Ward, Vice President, Investment Adviser Representative**

**Year of Birth:** 1967

**Education:** Oklahoma State University – B.S. in Marketing, 1989

**Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 08/2001 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to 03/2017  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 12/2004 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Julie Ward has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Clients are under no obligation to purchase securities or Advisory services through Julie Ward. Julie Ward is a Board member at Texas Advisory Project-BOD, a nonprofit organization.

### **Item 5 - Additional Compensation**

In the course of business Julie Ward does not receive economic benefit from non clients for providing Advisory services.

### **Item 6 - Supervision**

Julie Ward is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:

PHONE 949.460.9898 x 254  
EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Pamela Watson, Investment Adviser Representative**

**Year of Birth:** 1969

**Education:** B.A. Quantitative Economics and Decision Science, UC, San Diego, 1991

**Designation(s):** Certified Financial Analyst, CFA

<b>CFA - Chartered Financial Analyst</b>	
Designation	Chartered Financial Analyst
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CFA
Issuing Organization	CFA Institute
Prerequisites/Experience Required	Candidate must meet one of the following requirements: Undergraduate degree and four years of professional experience involving investment decision-making, or Four years qualified work experience (full time, but not necessarily investment related)
Educational Requirements	Self-study program (250 hours of study for each of the three levels)
Examination Type	Three course exams
Continuing Education/Experience Requirements	None

### **Employment for the Past Five Years:**

Employment Dates: 04/2010 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 05/2010 to 07/2014  
Firm Name: Financial Telesis Inc.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Pamela Watson has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

#### **Item 4 - Other Business Activities**

Pamela Watson is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Pamela Watson.

#### **Item 5 - Additional Compensation**

In the course of business Pamela Watson does not receive economic benefit from non clients for providing Advisory services. Pamela Watson may receive compensation in connection with her registration as a registered representative with Kestra Investment Services, LLC.

#### **Item 6 - Supervision**

Pamela Watson is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Ryan Williams, Investment Adviser Representative**

**Year of Birth:** 1982

**Education:** Bachelor of Science degree, Texas Tech University, 2005

**Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 08/2014 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Adviser  
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2014 to Present  
Firm Name: Kestra Investment Services, LLC.  
Type of Business: Broker Dealer/Investment Adviser  
Job Title & Duties: Registered Representative

Employment Dates: 09/2010 to 08/2014  
Firm Name: 401(k) Concierge  
Type of Business: Retirement planning services  
Job Title & Duties: Education/Rollover Services

Employment Dates: 05/2012 – 08/2014  
Firm Name: WFG Investments Inc.  
Type of Business: Broker Dealer  
Job Title & Duties: Registered Representative

Employment Dates: 10/2010 to 08/2014  
Firm Name: Lone Star Retirement Services  
Type of Business: Retirement planning services  
Job Title & Duties: Education/Rollover Services

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Ryan Williams has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Ryan Williams is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive Investment Adviser fees. Clients are under no obligation to purchase securities or Advisory services through Ryan Williams.

### **Item 5 - Additional Compensation**

In the course of business Ryan Williams does not receive economic benefit from non-clients for providing Advisory services. Ryan Williams may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Ryan Williams is supervised by Joel Shapiro, Senior Vice President ERISA Compliance. Joel Shapiro's contact information:

PHONE 949.460.9898 x 254;

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)

## **Michael Steven Wilson, Investment Advisor Representative**

**Year of Birth:** 1951

**Education:** Moorhead State University (B.A. Business Administration)

**Professional Designation(s):** N/A

### **Employment for the Past Five Years:**

Employment Dates: 04/2016 to Present  
Firm Name: NFP Retirement Inc.  
Type of Business: Investment Advisor  
Job Title & Duties: Investment Advisor Representative

Employment Dates: 10/2010 to Present  
Firm Name: NFP Corporate Services, (MN).  
Type of Business: Broker Dealer/Investment Advisor  
Job Title & Duties: Registered Representative

Employment Dates: 10/2010 to Present  
Firm Name: Kestra Financial Services, LLC.  
Type of Business: Broker Dealer/Investment Advisor  
Job Title & Duties: Registered Representative

Employment Dates: 01/2004 to 10/2010  
Firm Name: ING Financial Partners, Inc.  
Type of Business: Financial Institution  
Job Title & Duties: Registered Representative

### **Items 3 & 7 - Disciplinary Information**

As it relates to past, current or prospective clients, Michael Wilson has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

### **Item 4 - Other Business Activities**

Michael Wilson is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive investment advisory fees. Clients are under no obligation to purchase securities or advisory services through Michael Wilson.

### **Item 5 - Additional Compensation**

In the course of business Michael Wilson does not receive economic benefit from non clients for providing advisory services. Michael Wilson may receive compensation in connection with his registration as a registered representative with Kestra Investment Services, LLC.

### **Item 6 - Supervision**

Michael Wilson is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL [joel.shapiro@nfp.com](mailto:joel.shapiro@nfp.com)