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Firm CRD # 133096

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**FORM ADV PART 2A
BROCHURE**

This brochure provides information about the qualifications and business practices of New England Investment & Retirement Group, Inc. ("NEIRG"). If you have any questions about the contents of this brochure, please contact us at 978-975-2559, or by email at info@neirg.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. Additional information about NEIRG is available on the SEC's website at www.adviserinfo.sec.gov. NEIRG is an SEC-registered investment adviser. Throughout this brochure and related materials, NEIRG may refer to itself as a "registered investment adviser" or "being registered". These statements do not in any way imply a certain level of training or skill.

Item 2 Material Changes

The purpose of this Item 2 is to disclose material changes that have been made to this Brochure since the last annual update of this Brochure. The last annual update of this Brochure was filed on March 28, 2019.

There have been no material changes since the filing of our last annual updating amendment dated March 28, 2019

A copy of our brochure will be provided to any client or prospective client free of charge upon request. If you would like to receive a copy, please contact our Chief Compliance Officer at 978-975-2559 or info@neirg.com. Our brochure is also available on the SEC website www.adviserinfo.sec.gov.

Item 3 Table Of Contents

Item 2 Material Changes	2
Item 3 Table Of Contents	3
Item 4 Advisory Business	4
Item 5 Fees and Compensation	7
Item 6 Performance-Based Fees and Side-By-Side Management	9
Item 7 Types of Clients	10
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	10
Item 9 Disciplinary Information	12
Item 10 Other Financial Industry Activities and Affiliations	13
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..	13
Item 12 Brokerage Practices	14
Item 13 Review of Accounts	16
Item 14 Client Referrals and Other Compensation	17
Item 15 Custody	20
Item 16 Investment Discretion	20
Item 17 Voting Client Securities	21
Item 18 Financial Information	21
Item 19 Privacy Policy and Practices of NEIRG	21

Item 4 Advisory Business

Firm History and Ownership

New England Investment & Retirement Group, Inc. ("NEIRG" or the "Firm") was founded in 1995 by Nicholas J. Giacomakis. Mr. Giacomakis is the Firm's majority owner, President and Director. Brian Pirri is a minority partner of the Firm. The Firm's business is to provide investment management services as well as other ancillary services necessary to meet the financial needs of its clients. NEIRG is a Massachusetts corporation and its principal office is located in North Andover.

Investment Management Services

Asset Management Services. The Firm provides asset management services directly to clients, including high-net-worth individuals or families, trusts, estates, endowments, retirement plans and other legal entities. NEIRG generally provides investment guidance with respect to long/short equity and fixed income securities in a wide range of market capitalizations.

Types of Investments. NEIRG uses a number of centrally managed strategies or 'models' as building blocks for account diversification. The NEIRG models are designed with varying investment objectives, strategies, weightings of equities, fixed income and alternative investments, and risk. NEIRG's advice may include advice regarding the following securities:

- mutual funds
- exchange-traded funds
- equities (stocks)
- warrants
- corporate debt securities
- managed futures funds
- CDs
- municipal securities
- investment company securities (including variable annuities, variable insurance trusts, mutual fund shares)
- U.S. government securities
- options
- futures contracts and exchange traded funds
- bonds
- direct participation programs (including alternative energy programs, research and development programs, and leasing programs)
- Real estate investment trusts ("REITS")
- collateralized mortgage obligations ("CMOs")

If appropriate, NEIRG may recommend hedge funds or other restricted and/or unregistered products to qualified clients. Initial public offerings (IPOs) are not available through the Firm.

NEIRG also offers asset allocation services and investment recommendations to clients regarding variable annuity products, 529 college savings plans, and/or individual employer-sponsored retirement and deferred compensation plans. We either direct or recommend the allocation of assets among the various mutual fund and investment choices offered by the variable annuity, 529 plan or retirement/deferred compensation plan. Your assets are maintained at either the specific fund company or insurance company that issued the variable annuity or 529 plan or at the custodian designated by the sponsor of your retirement/deferred compensation plan.

Retirement Plan Account Allocation Advice. With respect to individuals' accounts under employer-sponsored retirement and deferred compensation plans, we may recommend the allocation of assets among the various mutual fund and other investment choices offered by the plan (which we refer to as "Plan Account Allocation Services"), but we do not assume custody of or have investment discretion with respect to such investments. Further, if such retirement and deferred compensation plan permits you to direct investment in individual securities (for example, using a directed "brokerage window"), we may, on request, recommend individual investments and will advise you on the securities you hold in the plan. You are responsible for implementing any recommendations we provide. Your plan account is governed by the plan documents and agreements with your plan's sponsor and other fiduciaries, including rules that specify the extent to which you may direct the investment of your account. We do not sponsor or provide advice to the plan and are not otherwise a party to the plan. We will recommend an asset allocation to you based on the information you provide about your financial situation, retirement investment objectives, and desired investment style, taking into account the investments available to you under the plan. We may also advise you periodically of any changes to the recommended investment strategy and selection of particular funds. You may accept the recommended strategy and advice regarding particular funds when directing your retirement plan account, or you may choose a different investment strategy or funds from time to time. We will not act as a fiduciary, or provide advice or recommendations with respect to any decision you may make whether to roll over assets from a retirement account. We may from time to time be requested to provide information about rolling over retirement plan assets into an IRA or other account, including accounts advised by NEIRG. Information we provide to you about rollovers is intended to provide you with general information that may be useful to your own investment decisions. That information may not address all relevant details of your personal situation, is not intended to be an individualized recommendation that you take any particular action, and should not serve as the primary basis for any rollover-related decision. You should carefully review the fees and other costs (including tax penalties), differences in investment options, and other material factors that may be associated with rolling over assets from an employer-sponsored retirement plan account.

Services for Retirement Plans. We advise 401(k) plans and other employer-sponsored retirement plans. Those services include advising the sponsor with respect to investment alternatives, default investments, performance of available investment options, and changes in investment options. We assist the sponsor with development of an investment policy statement and review investments against the policy. Our services include participant education, enrollment, and counseling on model portfolios, asset allocation and investment objectives generally. We serve as a plan fiduciary with respect to some of those activities.

Financial Planning Services. The Firm provides wealth management consulting services to clients upon request. A financial plan will be developed consistent with a client's financial and tax status, age, risk tolerance and investment objectives. NEIRG will gather financial information and history from clients including, but not limited to, retirement and financial goals, investment objectives, investment horizon, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, and other applicable financial information required by NEIRG in order to provide the consulting services requested. Based upon a client's needs, NEIRG will prepare a written financial plan addressing those needs. Whether or not to implement any of the recommendations detailed in the plan is at the client's discretion.

NEIRG may also provide other general, non-securities consultation on topics including tax planning analysis, estate planning analysis, business planning, retirement planning, education planning, budgeting and cash flow, risk management/insurance services, and/or fringe benefit analysis. NEIRG and its employees do not provide legal advice, and do not provide tax advice outside of the advice

given in relation to financial planning and asset management services. Implementation of any recommendations is at the discretion of the client.

Rejection of Client Accounts. NEIRG reserves the right to reject any account not consistent with its investment philosophy and reserves the right to decline management of any accounts for non-U.S. citizens.

Individual Client Needs

The Firm manages each client relationship individually in accordance with the client's stated investment goals and objectives. The Firm's financial advisers will gather information on a client's financial history, goals, objectives, and financial concerns and assist the client in developing an asset allocation strategy. To assist our clients with developing an investment objective, NEIRG prepares a Client Profile, Investor Questionnaire and Risk Profile ("Client Profile") for the client to complete. In addition to the information provided on the Client Profile, a financial adviser will schedule meetings with prospective clients to further understand their investment goals and objectives, and provide ongoing monitoring of client accounts. All information gathered from a client is confidential. (Please see Item 13 Review of Accounts for further information.)

The Firm will accommodate reasonable account restrictions imposed by the client with respect to management of accounts. However, the Firm reserves the right to decline guidelines submitted by clients determined in its sole judgment to be unduly restrictive or inappropriate in light of the client's suitability and/or risk tolerance.

Except as otherwise stated herein (e.g., for Plan Account Allocation Services), NEIRG generally has discretionary authority of its clients' accounts for the limited purpose of buying and selling securities in the accounts without communicating with the client prior to each transaction decision. The client always makes the final decision on the overall investment strategy. (Please see Item 16 Investment Discretion for further information.)

NEIRG may tailor the level of service among varying client types. For example, high-net-worth client arrangements may include additional advisory services not required or desired by other clients, such as recommendation of alternative investment vehicles, ongoing education regarding certain estate planning concepts, and more periodic evaluation of performance and investment objectives. Smaller accounts may not be invested fully in NEIRG models due to account size limitations. All advisory clients are assigned a financial adviser to oversee their investment accounts.

Assets Under Management

As of December 31, 2019, we provide continuous management services for \$652,339,207 in client assets on a discretionary basis, and \$2,686,877 in client assets on a non-discretionary basis.

Item 5 Fees and Compensation

Description of Fee Calculations and Schedule

The Firm generally bases its fees on a percentage of assets under management as described in the client's investment management agreement. NEIRG's current fee schedule for investment management accounts is as follows:

Account Size	Standard Tiered Annual Fees
First \$250,000 1.25%
Next \$1,250,000 1.00%
Next \$3,500,000 0.75%
Balance over \$5,000,000 0.65%

Fees are negotiable and may be waived in the sole discretion of the Firm. The Firm, in its sole discretion, may charge a different investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.). The Firm may negotiate hourly fees and/or fixed fees in certain circumstances for its Investment advisory fees and Financial Planning services.

For Plan Account Allocation Services, the Firm assesses an annual fee ranging from 0.30% to 0.60% (depending on the complexity and size of the account) of the value of the retirement plan account balance billed on a quarterly basis, but such fees may be modified or waived depending upon certain criteria at the Firm's sole discretion, as noted above.

For Retirement Plan Services, the Firm assesses an annual fee ranging from .20% to 1.00% (depending on the complexity and size of the plan as well as the scope of services provided), determined and billed monthly or quarterly depending on the plan.

Although a client has the right to make withdrawals from his account at any time, the Firm may terminate an account that falls below its minimum portfolio size of \$200,000. If assets are deposited to or withdrawn from an account after the inception of a quarter that exceed \$50,000, per transaction, the management fee payable with respect to the assets will be pro-rated based on the number of days remaining in the quarter.

Fee Billing

Investment management fees are billed quarterly, in advance, meaning that NEIRG charges its fee before the three-month billing period has begun. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. Clients will be provided with an account statement by the custodian which will detail the amount of the advisory fee deducted from the client's account. Clients have the option of paying as invoiced by NEIRG or through a direct debit from their account. Clients may make arrangements to pay management fees for a qualified account through a direct debit from their non-qualified account, if necessary.

If the account does not contain sufficient funds to pay the advisory fees, NEIRG has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees.

Fees for Plan Account Allocation Services, financial planning services or other wealth management consulting services are to be paid directly to the Firm as negotiated between NEIRG and the client (the

Firm may in some cases deduct such fees from other investment management accounts the client has with the Firm, if applicable, through direct debiting as described above if authorized by the client).

Other Fees

The Firm's investment management fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Oftentimes, an unmanaged security that was held in a client account may begin to accrue management fees if the security becomes actively managed, either due to a corporate action or at the request of a client.

The Firm recommends that clients establish accounts with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), Fidelity Brokerage Services LLC ("Fidelity"), or Charles Schwab & Co., Inc. ("Schwab") (generally and collectively, "Custodian(s)"), to maintain custody of clients' assets and to effect trades for their accounts. Although the Firm may recommend that clients establish accounts with a Custodian, it is the Client's decision where to custody assets. NEIRG is independently owned and operated and not affiliated with TD Ameritrade, Fidelity, or Schwab. The client does not pay a custody fee to TD Ameritrade, Fidelity or Schwab, although the client will incur transaction charges and other expenses, such as a custody fee for certain non-standard assets.

The Firm generally purchases shares of mutual funds at net asset value; however, any mutual fund shares held in a client account may be subject to deferred sales charges, 12b-1 fees, short-term redemption fees, and other mutual fund annual expenses. The fees and expenses are fully described in the fund's prospectus. All fees paid to the Firm for our services are separate and distinct from the fees and expenses charged by mutual funds. Mutual funds pay advisory fees to their managers and such fees are therefore indirectly charged to all holders of the mutual fund shares. If a client has mutual fund shares in their account, the client is effectively paying both the Firm and the mutual fund manager for the management of these assets. Please refer to the fund's prospectus or other offering document for additional information on fees and expenses. The Firm does not receive any compensation from fund companies.

We may recommend that you purchase variable annuities to be included in your investment portfolio(s). Advisory fees charged by NEIRG relating to variable annuities are in addition to the management fees and operating expenses charged by the insurance companies offering these products. Further information regarding fees assessed by a variable annuity company is available in the appropriate prospectus, which you may obtain upon request.

Clients are advised that when securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and / or tax ramifications.

Fee Refunds Upon Termination and Past Due Accounts

A client may terminate the investment management agreement by notifying the Firm in writing 30 days in advance and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, the Firm will refund any unearned portion of the advance payment. If termination occurs within five (5) business days of entering into an agreement for services, the client is entitled to a full refund.

Upon notice of termination, the Firm will no longer manage the assets in the client's account. The

Firm will await further instructions from the client as to what steps the client requests to transfer the account to another custodian or liquidate the account and remit the proceeds. Upon instructions received, the Firm will instruct the client's broker-dealer, mutual fund sponsors and others to carry out the client's wishes. The Firm can make no representation regarding puts, holds, or other investment features that may limit a client's ability to liquidate or transfer all or a portion of the account. For information on features that may limit or impair the ability to sell or transfer an asset, the client is advised to review the prospectus or offering document. NEIRG reserves the right to terminate any account upon appropriate notice to the client.

The Firm reserves the right to stop work on any account that is more than 30 days delinquent in paying its management fee to NEIRG. In addition, the Firm reserves the right to terminate any financial planning engagement where a Client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in the Firm's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

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

Performance-Based Fees

Fees charged to client accounts are based on assets under management, not on a share of the capital gains or capital appreciation of managed securities. The Firm will only structure a performance or other incentive fee arrangements for certain qualified clients on a limited basis, in accordance with the appropriate SEC rules and exemptions thereto. The Firm does not currently collect a performance-based fee from any client.

Side-By-Side Management

The Firm has adopted policies and procedures to mitigate possible inherent conflicts associated with managing accounts for multiple clients. It is NEIRG's goal to act in good faith and to treat all client accounts in a fair and equitable manner over time, regardless of their strategy, fee arrangement or the influence of their owners or beneficiaries. These policies are described in detail below.

Performance-Based Fees. The Firm does not collect a performance-based fee from any client at this time.

Employee Accounts. The Firm encourages employees to hold personal securities accounts, in accordance with NEIRG's Code of Ethics/Conduct. Accounts in which employees have a beneficial interest, or in which the Firm has a conflict of interest do not receive preferential treatment and to the extent possible, are aggregated with client trades. Executions are allocated pro rata and on an average price basis.

Investment Ideas. Investment ideas and recommendations are determined by the Firm's Investment Committee. Each of the Firm's financial advisers is a member of the Investment Committee and has an opportunity to act on investment decisions and ideas with their clients.

Identity of Accounts for Participation in Transactions. Transactions for each client account are generally effected independently of other client trades. Decisions to trade a client account are based on various factors, such as (i) account activity or a shift in an account's cash position, (ii) rebalancing the account due market shifts or corrections, or (iii) changes in a client's personal situation. Certain clients may request more frequent reviews and may set thresholds for triggering trading on a more frequent basis. Investment decisions in the strategies that we manage often affect more than one client account at a time. Our policies help ensure that identification of client accounts that participate in

investment opportunities are decided equitably among different client accounts over time.

Aggregation and Allocation of Client interests The Firm will generally aggregate trades when a model change is contemplated among many accounts. The Firm will not allocate trades in such a way that could result in a proprietary or affiliated account or certain client accounts receiving more favorable treatment than other client accounts. The Firm strives for trading and allocation practices to be fair and equitable to all client types with no group being favored or disfavored over any other group of clients.

Item 7 Types of Clients

Description

At present, the Firm's business consists primarily of providing investment advice to individuals (including high-net-worth individuals), pension and profit sharing plans, trusts, estates, charitable organizations, corporations or business entities. Client relationships vary in scope and length of service.

Account Minimums

NEIRG generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining asset management services. NEIRG will generally require clients to deposit a minimum of \$200,000 (cash or securities) to a brokerage account in order to participate in investment advisory services offered by NEIRG. However, under certain circumstances, the Firm may waive the minimum account size requirement and accept accounts less than \$200,000. Such circumstances may include, but not be limited to, additional assets will soon be deposited, or the client or other family members have other accounts with NEIRG. NEIRG reserves the right to terminate an account that falls below the minimum portfolio size of \$200,000.

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

Methods of Analysis and Investment Strategies

The Firm's core expertise is creating and actively managing investment accounts for clients based on their individual goals and objectives. The Firm utilizes both strategic and tactical asset allocation to achieve this. The Firm employs various investment strategies for each client based upon the goals and objectives stated by the client during consultations. The client may change these objectives at any time. Each client completes a client profile and risk assessment that documents their investment goals and objectives and their desired investment strategy.

In formulating investment advice, the firm uses various sources including the input and research of DiMeo, Schneider & Associates, LLC of Chicago, Illinois, a research/analytic firm NEIRG has an engagement with.

Strategies may include long-term and short-term trading, short sales, and margin transactions. To the extent appropriate based on a client's investment objective and strategy, the Firm may utilize options and option strategies in a client's portfolio. Some examples include long calls and puts, covered call writing, covered put writing or spread strategies. NEIRG does not engage in market timing activities, but we may increase cash holdings as deemed appropriate based on your risk tolerance and our expectations of market behavior. **Not all options strategies are suitable for every client and certain strategies may expose clients to significant potential losses.**

NEIRG has created a series of model strategy portfolios, each with its own unique investment objective. When a client establishes an account with the Firm, the client's assets are invested in the model strategy portfolio best suited to the client's needs and objectives. Based on the model strategy

portfolio's investment objectives, risk tolerance, etc., NEIRG will monitor the model strategy portfolio and its performance and make changes as necessary. At the client's preference, NEIRG will monitor accounts on a discretionary basis providing continuous and regular asset management services, or in-line with the model chosen to fit a client's financial objectives. NEIRG may also permit holdings outside of the model strategy portfolio at the client's discretion.

It should be noted that investing in securities involves a risk of loss that clients should be prepared to bear. Past performance is not indicative of future results.

Risk of Loss

All investment programs have certain risks that are borne by the investor. There can be no assurance that NEIRG will achieve its investment objective in managing client accounts. General fluctuations in the market prices of securities may affect the value of the investments held by a client. Instability in the securities markets also may increase the risks and volatility inherent in the investments. Assets may increase or decrease in value due to factors affecting securities markets generally, such as actual or anticipated changes in interest rates, inflationary expectations and other factors. Investing involves risk of loss that clients should be prepared to bear. Our investment approach constantly keeps the risk of loss in mind. Clients face the following investment risks:

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

Item 9 Disciplinary Information

The Firm's business is subject to various federal and state laws and regulations and, from time to time, regulators contact the Firm seeking information concerning its business activities. The Firm is required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or a prospective client's evaluation of our advisory business or the integrity of our management.

On August 6, 2015, NEIRG settled a matter with the Commonwealth of Massachusetts, Secretary of State's Securities Division. NEIRG consented to a settlement, without admitting or denying any wrongdoing, related to the firm's books and records associated with a single trust account established in 2007 and managed through 2014. NEIRG was ordered to pay a small fine, reimburse fees to its client, and take other remedial actions.

Summary

From April 2006 through March 2014, NEIRG provided investment portfolio management for a husband and wife. After discussions between the couple and NEIRG, NEIRG provided the couple with multiple estate attorney referrals and the couple decided to establish a trust for their investment assets. Between March and May of 2007, the estate attorney the couple selected drafted a family trust agreement for an irrevocable trust (the "Family Trust") with the couple's sons as trustees. In June of 2007, the couple informed NEIRG that they wanted to move their assets into their new trust account. During the account set-up period, paperwork was processed that established an account for a revocable trust named after the couple with the couple as trustees, rather than an account for the irrevocable Family Trust, with the sons as trustees. Although NEIRG's procedures stated that it needed to obtain a copy of the operative trust as part of its account opening procedures, NEIRG only received account opening documents signed by the couple declaring that they were the trustees. At some point, NEIRG received the front and back page of the Family Trust but did not contact the couple to question whether it had set up the trust account correctly. From 2007 through 2013, NEIRG treated the couple as trustees per the account paperwork that was signed, when, in fact, the sons were the Trustees of the Family Trust.

In the settlement of the matter, NEIRG consented: to pay a fine of \$10,000, to reimburse the couple's advisory and certain legal fees, to cease and desist from any actions relating to future books and records violations, to accept censure, and agreed to engage an independent consultant to review its Trust Account policies and procedures.

On December 18, 2012, NEIRG and Mr. Giacomakis consented to the entry of an order by the SEC without admitting or denying the allegations. A copy of the Order in its entirety may be accessed on the SEC's website (www.SEC.gov).

Summary

1. From approximately 2007 through 2011, NEIRG and Giacomakis, on several occasions, provided clients or prospective clients with reports generated using Morningstar Principia ("Principia") software. The Principia reports were used to assess various financial metrics. Among other things, the Principia reports purport to compare the historical performance and risk of NEIRG's equity and fixed income models to either an equity or fixed income benchmark ("NEIRG Principia reports"). However, these NEIRG Principia reports did not represent past performance of NEIRG's models. Instead, NEIRG generated the information in these reports by inputting in the Principia software the current investments of one of NEIRG's models and analyzing how the model would have performed had the model held its current investments throughout the entire time period in the NEIRG Principia report. In reality, the models did not exist throughout the entire time period in the report and the models' holdings changed over time during the period when they did exist. The NEIRG model performance reports did not

disclose that the model results portrayed were hypothetical, not actual, results. Giacomakis was responsible for distributing and presenting the NEIRG Principia reports to several clients and prospective clients of NEIRG.

2. In addition, throughout the relevant time period, NEIRG failed to implement written compliance policies and procedures reasonably designed to prevent its employees from presenting performance information to clients or prospective clients that did not violate the Advisers Act and its rules.

3. NEIRG and Giacomakis were jointly fined \$200,000, were subject to a cease and desist order, NEIRG was censured and required to engage an independent consultant to review its policies and procedures.

Item 10 Other Financial Industry Activities and Affiliations

Licensed Insurance Agents

Certain of NEIRG employees, in their individual capacities, are licensed insurance agents.

Exit Planning Services

Certain of NEIRG employees, in their individual capacities, have attained the Certified Exit Planning Advisor designation and engage with Clients in order to provide consulting services related to maximizing the long-term future value of a Company. These services are provided through an affiliate of NEIRG, Business Succession Advisers, LLC ("BSA"), under an agreement separate and distinct from the NEIRG Investment Advisory Agreement. Fees charged by BSA for business and succession services are separate and distinct from the compensation paid NEIRG for Investment Management Services.

The relationships described above create conflicts of interest, including the receipt of additional compensation. These conflicts are mitigated by a variety of factors, including the following: (1) NEIRG's fiduciary obligations to act in the best interest of its clients, (2) Employees' duty to honor the Code of Ethics, which prohibit firm personnel from acting in such a manner as to promote their own interests over those of the client, (3) NEIRG's obligation, on an ongoing basis, to review client accounts, and (4) NEIRG's commitment not to place its interests or those of any of its affiliates before its clients' interests when providing investment management services.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Overview of the Code of Ethics

NEIRG and its employees strive to conduct their securities and investment advisory business in accordance with the highest ethical standards and in line with all applicable securities regulations. NEIRG's has adopted a Code of Ethics/Conduct that complies with the requirements of the Investment Advisers Act of 1940, as amended, and establishes NEIRG's standards of business conduct for its employees and procedures. Specifically, the Code of Ethics requires its directors, officers and employees to conduct their affairs, including personal securities transactions in such a manner to avoid: (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their positions with NEIRG, and (iii) any actual or potential conflicts of interest or any abuse of their positions of trust and responsibility. A copy of our Code will be provided to any client or prospective client free of charge upon request by contacting our Chief Compliance Officer at 978-975-2559 or info@neirg.com.

NEIRG has adopted various procedures and internal controls to review, monitor and ensure that the Firm's policies on personal securities transactions are observed, properly implemented and amended and/or updated, as appropriate. In summary, the Firm's Code of Ethics require all employees to (i) acknowledge that they have read and understand the Code, and reaffirm such acknowledgement at least annually, (ii) initially identify all personal investment accounts and any accounts opened or closed on a quarterly basis, and (iii) report all personal securities holdings and transactions on a quarterly basis. To comply with the personal trading rules under the Code, the Firm requires its access persons to maintain brokerage accounts that hold or may hold Reportable Securities (as that term is defined in the Firm's Code of Ethics to generally mean any equity securities or options on such securities) with the broker dealer(s) where NEIRG's Client accounts are held and over which the CCO has oversight. Accounts may be maintained with another broker-dealer subject to pre-approval by the CCO. The Firm's Chief Compliance Officer or designee reviews all employee trades using the Firm's trading blotter, employee account statements, and client account statements.

Participation or Interest in Client Transactions

As a general matter, NEIRG believes that its clients' interests are best served when members of the Firm buy and sell the same securities for themselves that they also buy and sell for clients. NEIRG also understands that a potential conflict of interest could exist when employees trade the same securities as clients. NEIRG strives to always put client interests ahead of the Firm and its employees.

The Firm's trader will place trades for employees in blocks with client trades whenever possible. If a trade for an employee is filled before a client trade or at a better price than the client received, the Chief Compliance Officer will review the circumstances surrounding the trade and either approve the trade or have the trade reversed and/or profits disgorged. When monitoring post-trade activity, the Chief Compliance Officer will consider factors such as price differential, market capitalization, trade size and short-term profits. In the event of a partially-filled order, client account allocations will be filled in their entirety before employee trades are filled. Since the Firm trades primarily in mutual funds, exchange traded securities (ETFs) and large cap, liquid securities, it is unlikely that employees may front-run client trades or otherwise move the markets to create an opportunity for employees to benefit from client trades.

Error Correction Trades

From time to time, trading errors may occur. The Firm strives to correct errors in client accounts in a fair and timely manner and in a way that the client will not suffer a loss. In certain circumstances, correcting an error may require the Firm to take ownership of a security in its own error account. The disposition of those securities may create a gain for the Firm. To manage potential conflicts concerning errors, NEIRG has implemented a written trade error policies and procedures.

Principal or Agency Cross Trading

The Firm does not affect principal transactions with clients. Generally, the Firm will not execute an agency cross securities transactions between client accounts. In limited circumstances, NEIRG may effect a cross agency transaction between one client and another if such trade would benefit each participant account and only when authorized in advance by both clients. Cross trades will be conducted at an independent, current market price and would not involve a commission, mark-up or any other additional compensation to NEIRG.

Item 12 Brokerage Practices

Selecting Brokerage Firms and Client-Directed Brokers

NEIRG generally recommends that its investment management clients custody their accounts/assets at unaffiliated broker/dealer custodians with which NEIRG has an institutional relationship. Currently,

these include TD Ameritrade, Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member, Fidelity Brokerage Services LLC ("Fidelity"), and Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC (generally and collectively, "BD/Custodian(s)"), all of which are "Qualified Custodians" as that term is described in Rule 206(4)-2 of the Investment Advisers Act of 1940. Each BD/Custodian provides custody of securities, trade execution, and clearance and settlement of transactions placed by NEIRG.

In selecting a BD/Custodian, some of the factors that NEIRG considers include:

- Trade order execution and the ability to provide accurate and timely execution of trades;
- The reasonableness and competitiveness of commissions and other transaction costs;
- Access to a broad range of investment products;
- Access to trading desks;
- Technology that integrates within NEIRG's environment, including interfacing with NEIRG's portfolio management system;
- Access to research;
- Ability to provide a full range of options for account registrations for NEIRG's clients;
- Availability of a soft dollar or additional services program;
- A dedicated service or back office team and its ability to process seamlessly and timely myriad requests from NEIRG on behalf of its clients;
- Ability to provide NEIRG with access to client account information through an institutional website; and
- Ability to provide clients with electronic access to account information and investment and research tools.

NEIRG may place portfolio transactions through the BD/Custodian where the clients' accounts are custodied. In exchange for using the services of the BD/Custodian, NEIRG may receive, without cost, computer software and related systems support that allows NEIRG to monitor and service its clients' accounts maintained with such BD/Custodian. Additional benefits include the receipt of duplicate client confirmations and bundled duplicate statements, access to a trading desk that exclusively services institutional brokerage group participants, access to block trading services that provide the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts, and/or access to an electronic communication network for client order entry and account information. Other benefits NEIRG may receive include consulting, publications, and conferences on practice management, information technology, business succession, and regulatory compliance. The availability of these services from the BD/Custodians benefits NEIRG in that it does not have to produce or purchase them. As applicable, NEIRG's receipt of such benefits is reviewed to ensure compliance with Securities Exchange Act 28(e)'s safe harbor for so-called "soft dollar" arrangements and the SEC's latest guidelines.

The BD/Custodian is authorized to utilize broker-dealers to execute orders for the purchase and sale of securities for NEIRG's clients who, in its best judgment, can provide "best execution", meaning prompt and reliable execution at a reasonable competitive price. Once best execution criteria are satisfied, the BD/Custodian may consider those broker-dealers who supplement its capabilities with certain appropriate services. All services received from broker-dealers to whom commissions are paid are used collectively, to the extent practicable, to benefit all the BD/Custodian clients, including NEIRG clients. As provided by the Securities Exchange Act of 1934, the BD/Custodian is permitted to cause higher commissions to be paid to broker-dealers who provide brokerage and research services than to broker-dealers who do not provide such services, if such higher commissions are deemed reasonable in relation to the value of the brokerage and research services provided. In determining the abilities of

a broker-dealer, neither the BD/Custodian nor NEIRG will consider client referrals or the sale of mutual fund shares.

We believe that TD Ameritrade, Fidelity, and Schwab provide quality execution services for our clients at competitive prices. NEIRG will monitor brokerage fees for reasonableness and best price and execution. If rates are not determined to be reasonable, NEIRG will contact clients.

NEIRG does not permit clients to direct brokerage to any particular broker.

Research and Soft Dollar Benefits

NEIRG does not currently have soft-dollar agreements with any broker-dealer but the firm does receive certain economic benefits from TD Ameritrade, Fidelity, and Schwab as more fully described in Item 14.

Investment Allocation and Trading Policies

NEIRG strives to provide clients fair and equitable treatment when allocating investment opportunities and aggregating client orders among clients.

Transactions for each client generally will be effected independently when the decision is made to trade the account, with each client obtaining market value for the security trade and associated trading costs. The Firm may (but is not obligated to) aggregate or "batch" such orders to obtain best execution. The Firm generally aggregates trades if it decides to purchase or sell the same securities for several clients at approximately the same time, such as trading securities in one of its investment models. When aggregating trades for more than one client, transactions will generally be averaged as to price and allocated among the Firm's clients pro rata. The Firm will not receive any additional compensation as a result of the aggregation of orders.

Item 13 Review of Accounts

Investment Management Accounts

Investment strategies are managed by the Investment Committee, which consists of the Firm's financial advisers, traders, and investment officers. The financial advisers are responsible for understanding their client's specific investment objectives, restrictions, income requirements, risk tolerance, and to structure client accounts to meet the respective client's objectives. The financial adviser is also responsible for maintaining open and continual communications with their clients and to meet with clients on a regular basis, no less frequently than annual. On each quarterly Performance Report, clients are reminded to contact their investment advisor if there is a change to their financial situation and/or investment objectives.

In addition to reviewing client accounts on an annual basis or whenever a client has a meeting with their financial adviser, the Firm's traders review client accounts whenever clients make an additional deposit/withdrawal of funds into their account, or when rebalancing accounts due to market activities, when input is received from our research and analytic firm DiMeo, Schneider & Associates, LLC, or other triggering events. Triggering events may include, but are not limited to, changes in the tax laws, new investment information, changes to the management and structure of a mutual fund or company in which clients assets are invested, market shifts and corrections and changes in a client's personal situation. Clients may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Levels of review will vary depending on client needs at the time of review as well as changes in the financial status or position (tax status or otherwise), financial goals, current market conditions, performance standards, suitability changes and age, among other things.

Financial Planning

NEIRG will review a client's financial plan at any time upon request from the client. NEIRG recommends reviewing a financial plan on an annual basis, either in whole or in part, or at any time a plan requires a major revision resulting, for example, from the sale of a business, a divorce or other significant event that can alter a financial status. A fee may be charged for such service.

Performance Reports

NEIRG provides performance statements to clients on a quarterly basis for no additional fee. These reports summarize the account's portfolio holdings and account performance information as compared to a relevant benchmark. NEIRG will deliver reports either electronically or via U.S. mail (at each client's preference) to distribute quarterly performance reports. NEIRG also makes quarterly performance reports available to clients via the Firm's website upon a client's request.

Clients are urged to compare their performance reports from NEIRG to their custodian account statement. Please note that the custodian account statement is the client's official statement with respect to your account.

Custodian Reports

For advisory account assets held at TD Ameritrade, Fidelity, or Schwab, qualified custodians, the custodian provides account statements directly to clients at their address of record at least quarterly. Clients are also provided with confirmations for each securities transaction executed in the client's account directly from the account custodian. Clients are urged to compare their performance reports from NEIRG to their custodian account statement and/or reporting from other institutions where your assets are maintained. Please note that the custodian account statement is the client's official statement with respect to your account.

Item 14 Client Referrals and Other Compensation**Solicitation Program**

The Firm may enter into arrangements with third party individuals and/or firms ("Solicitor") whereby the Solicitor will refer clients who may be a candidate for investment advisory services offered by NEIRG. In return, NEIRG may agree to compensate the Solicitor for the referral. Compensation to solicitor will be a percentage of NEIRG's fee as agreed upon between NEIRG and Solicitor. Any referral fee paid to a Solicitor shall be paid solely from the Firm's investment management fee, and shall not result in any additional charge to the client. NEIRG's referral program is in compliance with the federal regulations as set out in 17 CFR Section 275.206(4)-3. The solicitation/referral fee is paid pursuant to a written agreement entered into between NEIRG and the Solicitor. The Solicitor will be required to provide the client with a copy of NEIRG's Form ADV Part 2 and a Solicitor Disclosure statement at the time the referral is made to NEIRG. The Solicitor is not permitted to offer clients any investment advice on behalf of NEIRG.

NEIRG also compensates employees for client referrals based on a percentage of advisory fees received by the firm. Such employees disclose their status as an employee of NEIRG at the point of any client solicitation or referral.

Client Referrals

The Firm may occasionally recommend other professionals to the client at the request of the client, such as lawyers, accountants, insurance agents, etc. These professionals are engaged directly by the client. Conflicts of interest will be disclosed to the client in the unlikely event they should occur. NEIRG does not accept referral fees or any form of remuneration from other professionals when NEIRG refers a prospect or client to them. NEIRG may share commissions it receives for insurance products with

another agent; however, this commission split will not result in any additional charge to the client.

Other Compensation from TD Ameritrade

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

The Firm has negotiated with TD Ameritrade a period of free trading for accounts rebalanced in the Firm's program that are transferred to TD Ameritrade, which may create an economic benefit for the Firm. The benefit received by the Firm or its personnel does not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duty to clients, the Firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of this economic benefit by the Firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Firm's choice of TD Ameritrade for custody and brokerage services.

The Firm also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the Additional Services currently include: Advent- Black Diamond Performance Reporting software. TD Ameritrade provides the Additional Services to the Firm in its sole discretion and at its own expense, and the Firm does not pay any fees to TD Ameritrade for the Additional Services. The Firm and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

The Firm's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to the Firm, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, the Firm's client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with the Firm, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, the Firm may have an incentive to recommend to its clients that the assets under management by the Firm be held in custody with TD Ameritrade and to

place transactions for client accounts with TD Ameritrade. The Firm's receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including seeking best execution of trades for client accounts.

Other Compensation from Fidelity

As disclosed above, NEIRG participates in Fidelity's institutional customer program and recommends Fidelity to clients for custody and brokerage services. There is no direct link between the Firm's participation in the program and the investment advice it gives to its clients, although the Firm receives economic benefits through its participation in the program that are not typically available to Fidelity retail investors. These benefits may include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Firm participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; integrated Trust Services; integrated charitable and foundation services; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Firm by third party vendors. Some of the products and services made available by Fidelity through the program may benefit the Firm but may not benefit its client accounts. These products or services may assist the Firm in managing and administering client accounts, including accounts not maintained at Fidelity. As part of its fiduciary duties to clients, the Firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Firm's choice of Fidelity for custody and brokerage services.

Other Compensation from Schwab

As disclosed above, NEIRG participates in Schwab's institutional customer program and recommends Schwab to clients for custody and brokerage services. There is no direct link between the Firm's participation in the program and the investment advice it gives to its clients, although the Firm receives economic benefits through its participation in the program that are not typically available to Schwab's retail investors. These benefits may include the following products and services (provided without cost or at a discount): Investment research, both Schwab's own and that of third parties; Provide access to client account data (such as duplicate trade confirmations and account statements); Facilitate trade execution and allocate aggregated trade orders for multiple client accounts; provide pricing and other market data; Facilitate payment of our fees from our clients' accounts; Assist with back-office functions, recordkeeping and client reporting; Educational conferences and events; Technology, compliance, legal, and business consulting; Publications and conferences on practice management and business succession; and; access to employee benefits providers, human capital consultants and insurance providers. Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel. Some of the products and services made available by Schwab through the program may benefit the Firm but may not benefit its client accounts. These products or services may assist the Firm in managing and administering client accounts, including accounts not maintained at Schwab. As part of its fiduciary duties to clients, the Firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Firm's choice of Schwab for custody and brokerage services.

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates were negotiated based on our commitment to maintain \$10,000,000.00 of our clients' assets statement equity in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be if we had not made the commitment. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients.

Item 15 Custody

NEIRG has established procedures to ensure client funds are held at a qualified custodian in a separate account for each client under that client's name. NEIRG does not permit its employees or the Firm to accept or maintain direct custody of client assets. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the custodian's name, address and the manner in which the funds or securities are maintained. Account statements are delivered directly from the custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against any other client reports (such as performance reports) received from NEIRG. When clients have questions about their account statements, they should contact NEIRG or the custodian preparing the statement.

Custody is generally defined by the Investment Advisers Act of 1940 as having access or control over client funds and/or securities. Custody is not necessarily limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented. Authorization to trade in client accounts is not considered to be custody.

Whenever NEIRG is given the authority to deduct management fees directly from client accounts, NEIRG is deemed to have custody. The investment management agreement between a client and NEIRG gives NEIRG authority to have fees directly deducted from a client's account when providing asset management services. NEIRG is also deemed to have custody over assets in accounts from which NEIRG has the authority to transfer funds to third parties via standing letter of authorization (SLOA). In the event an employee inadvertently receives securities, or other assets from a client, such employee must immediately arrange to return such assets to the client within three business days of receiving them.

Item 16 Investment Discretion

NEIRG will generally maintain discretionary trading authority to manage securities accounts on behalf of clients, as set forth in the client's investment management agreement with the Firm. This authority gives the firm discretion 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.

Although NEIRG manages accounts on a discretionary basis, clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to the Firm so long as the limitations are specifically set forth in writing to the Firm and do not impede the Firm from implementing the account's overall investment strategy.

With respect to Plan Account Allocation Services, NEIRG does not assume custody of or have investment discretion with respect to such investments. Custody is generally maintained by the plan

custodian designated by the sponsor of your plan, and you (not NEIRG) are responsible for implementing any recommendations we provide.

Class Actions, Bankruptcy Claims and Other Legal Proceedings

Class actions, bankruptcy claims and other types of legal proceedings require legal advice that the Firm is not qualified to render. Therefore, NEIRG cannot facilitate the filing of legal claims on behalf of clients. It is the client's responsibility to consult their legal counsel if necessary to determine whether or not a client should pursue such matters and to make any necessary filings. Clients should recognize that there is no duty upon the Firm to provide information regarding these types of claims or to monitor such proceedings. Whenever possible, the Firm will assist clients regarding these types of claims, but that it will undertake only commercially reasonable efforts to do so, and will not be responsible for any unreasonable delays in transmission or omissions.

Item 17 Voting Client Securities

NEIRG does not vote proxies on securities on behalf of clients. It is the client's responsibility to vote or not vote all securities held in their account. Please contact the Firm's Chief Compliance Officer at 978-975-2559 or info@neirg.com for instructions on how to obtain voting proxy materials from your Custodian.

Item 18 Financial Information

This item is not applicable to NEIRG. Please note that NEIRG does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients, and has not been the subject of a bankruptcy petition at any time.

Item 19 Privacy Policy and Practices of NEIRG

New England Investment & Retirement Group, Inc.'s mission is to help our clients pursue financial independence by providing unbiased, objective guidance. We value the trust our customers have placed in us and are committed to preserving the private nature of our relationship with you. We are proud of our privacy and confidentiality practices, and we want you to know how we protect your information.

Please take a moment to review our privacy policy, as described below.

Gathering Information

We treat the information we gather about you in a confidential manner. New England Investment & Retirement Group, Inc. collects this personal information to help us serve your financial needs, provide customer service, and fulfill legal and regulatory requirements. We also collect your personal information to verify your identity and determine your eligibility and suitability for certain financial products and services. New England Investment & Retirement Group, Inc. collects nonpublic personal, financial, and health information from sources that may include:

- Information you provide us on applications and related forms, such as name, address, social security number, assets, and income (and medical information if applying for insurance)
- Documents you provide us when you open your account, such as a driver's license, passport or other documentation to verify your identity
- Information regarding your transactions with us, such as products or services purchased, account balances, and payment history

- Information from consumer reporting agencies, such as credit relationships
- Information from your employer, association, or benefit plan sponsor, such as name, address, social security number, assets, and income

Sharing Information

New England Investment & Retirement Group, Inc. does not disclose any nonpublic personal information about you unless we receive your prior written consent, we believe the recipient is your authorized representative, or we are required or permitted by law. We do not sell your personal information to third parties. In the course of servicing your account, however, we may share previously described information about our customers with other unaffiliated service providers, such as insurance companies, mutual fund companies, banks, custodians or investment firms, to provide account maintenance or customer service to your account. We may disclose your information to other organizations, such as government agencies and law enforcement officials (e.g., for tax reporting or under court order).

Safeguarding Privacy

New England Investment & Retirement Group, Inc. maintains physical, electronic, and procedural safeguards regarding your non-public personal information to ensure we are complying with our own policy, industry practices, and federal and state regulations. We restrict and limit employee access to client information to only those who need it to carry out their business functions. We educate our employees about safeguarding client information and preventing its unauthorized access, disclosure or use. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Questions

You do not have to contact us to benefit from New England Investment & Retirement Group, Inc.'s privacy protections; they apply automatically to all of our customers. However, if you have any questions after reading this privacy policy, we encourage you to contact our Chief Compliance Officer or your financial advisor.

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Standards for the Protection of Personal Information

NEIRG maintains an information security program to reduce the risk that your personal and confidential information may be breached in-line with Massachusetts General Law Chapter 93H, Standards of the Protection of Personal Information for Residents of the Commonwealth of Massachusetts. This regulation establishes minimum standards to be met in connection with the safeguarding of personal information contained in both paper and electronic records. The objectives of this regulation are to insure the security and confidentiality of customer information in a manner fully consistent with industry standards; protect against anticipated threats or hazards to the security or integrity of such information; and protect against unauthorized access to or use of such information that may result in substantial harm or inconvenience to any consumer.

Business Continuity Plan

NEIRG has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. Electronic files are backed up daily and archived.