



# **INFINITY FINANCIAL SERVICES ADVISORY**

## **FIRM BROCHURE - FORM ADV PART 2A**

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## Item 2: Material Changes

Infinity Financial Services Advisory has the following material changes to report. Material changes relate to Infinity Financial Services Advisory policies, practices or conflicts of interests.

- ❖ Infinity Financial Services Advisory may, via written arrangement, retain third parties to act as solicitors for IFSA's investment management services. (Item 14)

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**Instructions:** This brochure provides information about the qualifications and business practices of Gilbert Greg RIA, LLC dba Infinity Financial Services Advisory. If you have any questions about the contents of this brochure, please contact us at (510) 588-8000 or by email at: [info@8financial.com](mailto:info@8financial.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 Infinity Financial Services Advisory is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Infinity Financial Services Advisory CRD number is: 304981.

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Infinity Financial Services Advisory (hereinafter "IFSA") is a Limited Liability Company organized in the State of California. The firm was formed in September 2018, and the principal owner is Greg Gilbert.

### B. Types of Advisory Services

#### *Portfolio Management Services*

IFSA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. IFSA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- ❖ Investment strategy
- ❖ Personal investment policy
- ❖ Asset allocation
- ❖ Asset selection
- ❖ Risk tolerance
- ❖ Regular portfolio monitoring

IFSA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. IFSA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

IFSA seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of IFSA's economic, investment or other financial interests. To meet its fiduciary obligations, IFSA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, IFSA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is IFSA's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

#### *Financial Planning*

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/ credit planning.

### ***Selection of Other Advisers***

IFSA may direct clients to third-party investment advisers. Before selecting other advisers for clients, IFSA will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where IFSA is recommending the adviser to clients.

### ***Pension Consulting Services***

IFSA offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- ❖ identifying investment objectives and restrictions
- ❖ providing guidance on various assets classes and investment options
- ❖ recommending money managers to manage plan assets in ways designed to achieve objectives
- ❖ monitoring performance of money managers and investment options and making recommendations for changes
- ❖ recommending other service providers, such as custodians, administrators and broker-dealers
- ❖ creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

### ***Services Limited to Specific Types of Investments***

IFSA generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors) and treasury inflation protected/ inflation linked bonds. IFSA may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

IFSA offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

## **D. Wrap Fee Programs**

IFSA acts as portfolio manager for and sponsor of a wrap fee program, which is an investment program where the client pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. However, this brochure describes

IFSA's non-wrap fee advisory services; clients utilizing IFSA's wrap fee portfolio management should see IFSA's separate Wrap Fee Program Brochure. IFSA manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts. IFSA receives the wrap fee for its advisory services.

## **E. Assets Under Management**

IFSA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$130,443,814.00	\$0	March 2020

## Item 5: Fees and Compensation

### **A. Fee Schedule**

#### ***Portfolio Management Fees***

Total Assets Under Management	Annual Fees
\$10,000 - \$99,999	.25% to 2.50%
\$100,000 - \$249,999	.25% to 2.25%
\$250, 000 - \$499,999	.25% to 2%
\$500,000 - \$749,999	.25% to 1.75%
\$750,000 - \$1,249,999	.25% to 1.50%
\$1,250,000 - \$4,999,999	.25% to 1.25%
\$5,000,000 - \$24,999,999	.25% to 1.0%
\$25,000,000 and greater	.25% to .75%

*\*Not applicable for third party asset managers and separately managed accounts.*

The advisory fee is calculated in advance based on the average daily balance of the account assets during the prior month. These fees are generally negotiable and have a maximum fee allowed based on the above schedule. It will then be memorialized in the client's advisory agreement as to the exact fee. Clients may terminate the agreement without penalty for a full refund of IFSA's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with thirty days' prior written notice.

#### ***Monthly Service and Reporting Fee***

All accounts will be charged a monthly service and reporting fee. The fee is based on an annual fee of \$100 or 5 basis points, whichever is higher. The fee is based on the average daily balance of the account value from the prior month, irrespective of any assets that have been excluded from the managed fee. The purpose of this fee is to offset the cost of third-party billing services, which allows the firm to calculate the advisory fees, provide invoicing, and allows the representatives to provide performance reporting on their account (s).

#### ***Brokerage ticket charges and trading expenses***

All unbundled accounts are considered not to be apart of the wrap fee program. Clients in a non-wrap fee account will pay their own brokerage ticket charges and trading expenses.

#### ***Financial Planning Fees***

The negotiated hourly fee for these services is between \$100 and \$250.

Clients may terminate the agreement without penalty, for full refund of IFSA's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

#### ***Selection of Other Advisers Fees***

IFSA may direct clients to third-party investment advisers. IFSA will receive its standard fee on top of the fee paid to the third-party adviser. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

#### ***Pension Consulting Services Fees***

The rate for pension consulting services is between \$150 and \$250 per hour or 1.00% of the plan assets for which IFSA is providing such consulting services. These fees are negotiable.

## ***B. Payment of Fees***

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in advance.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check 100% in advance, but never more than six months in advance.

### ***Payment of Selection of Other Advisers Fees***

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor. The third-party will always collect the money and send it to Infinity Financial Services Advisory. Fees paid are dependent on the third-party, they can be collected in advance or arrears.

### ***Payment of Pension Consulting Services Fees***

In advance by check or credit card paid directly to the firm. If additional time will be needed an amendment to the agreement will be provided and work will resume with payment in advance by check or credit card paid directly to the firm.

## ***C. Client Responsibility for Third Party Fees***

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by IFSA. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## ***D. Prepayment of Fees***

IFSA collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

## ***E. Outside Compensation for the Sale of Securities to Clients***

Greg Gilbert is the Chief Compliance Officer of Infinity Securities, Inc and Supervises some Investment Advisor Representatives are also Registered Representatives of the broker-dealer and licensed insurance agents, and in these roles, they could accept compensation for the sale of investment products to IFSA clients.

### ***This is a Conflict of Interest***

Supervised persons may accept compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds to IFSA's clients. This could present a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's long-term needs. When recommending the sale of investment products for which the supervised persons receives compensation, IFSA will inform the client of the conflict of interest.

### ***Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase IFSA recommended products through other brokers or agents that are not affiliated with IFSA.

### ***Commissions are not IFSA's primary source of compensation for advisory services***

Commissions are not IFSA's primary source of compensation for advisory services.

### ***Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are reduced to offset the commissions or markups on investment products recommended to clients.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

IFSA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

IFSA generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations

There is an account minimum of \$10,000, which may be waived by IFSA in its discretion.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### ***A. Methods of Analysis and Investment Strategies***

#### ***Methods of Analysis***

IFSA's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

**Charting analysis** involves the use of patterns in performance charts. IFSA uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.



**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

### ***Investment Strategies***

IFSA uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## ***B. Material Risks Involved***

### ***Methods of Analysis***

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

### ***Investment Strategies***

IFSA's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

**IFSA's use of options** trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes

and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

As a Chief Compliance Officer and Registered Representative of Infinity Securities, Inc. dba Infinity Financial Services, Greg Burton Gilbert accepts compensation for the sale of securities as do the Registered Representatives of the Broker Dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither IFSA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Greg Burton Gilbert is a Registered Representative and Chief Compliance Officer of Infinity Securities, Inc. dba Infinity Financial Services and from time to time, he as well as the other dually Registered Representatives will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a Registered Investment Adviser. IFSA always acts in the best interest of the client, including with respect

to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of IFSA in such individual's capacity as a registered representative.

Several Registered Representatives are licensed insurance agent with Infinity Securities, Inc. dba Mar Vista Insurance Agency, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. IFSA always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of IFSA in connection with such individual's activities outside of IFSA.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

IFSA may direct clients to third-party investment advisers. Clients will pay IFSA its standard fee in addition to the standard fee for the advisers to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. IFSA will always act in the best interests of the client, including when determining which thirdparty investment adviser to recommend to clients. IFSA will ensure that all recommended advisers are exempt, licensed or notice filed in the states in which IFSA is recommending them to clients.

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

#### **A. Code of Ethics**

IFSA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. IFSA's Code of Ethics is available free upon request to any client or prospective client.

#### **B. Recommendations Involving Material Financial Interests**

IFSA does not recommend that clients buy or sell any security in which a related person to IFSA or IFSA has a material financial interest.

#### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of IFSA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of IFSA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. IFSA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

#### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of IFSA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of IFSA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, IFSA will never engage in trading that operates to the client's disadvantage if representatives of IFSA buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on IFSA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and IFSA may also consider the market expertise and research access provided by the broker- dealer/ custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in IFSA's research efforts. IFSA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker- dealer/ custodian.

IFSA will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC; Folio Institutional, Inc Member FINRA/SIPC; or RBC Brokerage Member FINRA/SIPC.

#### ***Research and Other Soft-Dollar Benefits***

While IFSA has no formal soft dollars program in which soft dollars are used to pay for third party services, IFSA may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). IFSA may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and IFSA does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. IFSA benefits by not having to produce or pay for the research, products or services, and IFSA will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that IFSA's acceptance of soft dollar benefits may result in higher commissions charged to the client.

#### ***Brokerage for Client Referrals***

ISFA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### ***Clients Directing Which Broker/Dealer/Custodian to Use***

IFSA will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

IFSA does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Randomly selected accounts are sampled for IFSA's advisory services provided on an ongoing basis are reviewed at least Monthly by compliance department under Greg Gilbert, CCO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at IFSA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Greg Gilbert, CCO. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

## **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, IFSA's services will generally conclude upon delivery of the financial plan.

## **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of IFSA's advisory services provided on an ongoing basis will receive at a minimum, a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report can come from the custodian. In addition to the custodial statements, portfolio management clients will also receive a monthly performance report from IFSA. These reports are generated using third party software.

Each financial planning client will receive the financial plan upon completion.

# **Item 14: Client Referrals and Other Compensation**

## **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

IFSA participates in the institutional advisor program (the "Program") offered by TD Ameritrade, Folio Institutional, and RBC Brokerage. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. IFSA receives some benefits through its participation in the Program.

As disclosed above, IFSA participates in advisor programs and IFSA may recommend different third parties to clients for custody and brokerage services depending on client needs. There is no direct link between IFSA's participation in the Programs and the investment advice it gives to its clients, although IFSA receives economic benefits through its participation in the Programs that are typically not available to 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 IFSA 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 IFSA's 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 IFSA by third party vendors. The third parties may also pay for business consulting and professional services received by IFSA's related persons. Some of the products and services made available by third parties through the Program may benefit IFSA but may not benefit its client accounts. These products or services may assist IFSA in managing and administering client accounts, including accounts not maintained at the third-party brokerages. Other services made available by third party brokerages are intended to help IFSA manage and further develop its business enterprise. The benefits received by IFSA or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to the third-party brokerages. As part of its fiduciary duties to clients, IFSA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by IFSA or its related persons in and of itself creates a conflict of interest and may indirectly influence the IFSA's choice of the third-party brokerages for custody and brokerage services.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

IFSA may, via written arrangement, retain third parties to act as solicitors for IFSA's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. All such referral activities will be conducted in accordance with Rule 206(4)-3 under the Advisers Act, where applicable.



## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, IFSA will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

IFSA provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, IFSA generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

## **Item 17: Voting Client Securities (Proxy Voting)**

IFSA will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

IFSA neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither IFSA nor its management has any financial condition that is likely to reasonably impair IFSA's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

IFSA has not been the subject of a bankruptcy petition in the last ten years.