



NFP Retirement, Inc.

dba 401(k) Advisers

dba 403(b) Advisers

dba Fiduciary First

Registered Investment Adviser

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www.nfp.com/corporate-benefits/retirement

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FORM ADV BROCHURE PART 2A

Item I

This brochure provides information about the qualifications and business practices of NFP Retirement a registered Investment Adviser under the name NFP Retirement, Inc. Any questions about the contents of this brochure please contact us at 949.460.9898. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about NFP Retirement is also available on the SEC's website at www.Adviserinfo.sec.gov. The IARD/CRD number for NFP Retirement is 121254.

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

NFP RETIREMENT, INC CLIENT RELATIONSHIP SUMMARY

NFP Retirement, Inc. (NFP) is an investment adviser registered with the Securities and Exchange Commission (SEC) that offers advisory accounts and services rather than brokerage accounts and services.

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. **Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.**

What investment services and advice can you provide me?

We offer Asset Management and Retirement Plan Consulting Services to retail investors.

Asset Management Services:

- We will provide you advice on a regular basis. We will discuss your investment goals and help you design a strategy to achieve your investment goals
- We will regularly monitor your account
- You can choose an account that allows us to buy and sell investment in your account without asking you in advance (a “discretionary account”) or we may give you advice and you decide what investments to buy and sell (a “non-discretionary account”). If you choose a non-discretionary account, you will make the ultimate decision to buy or sell an investment.
- We will review your account no less than annually and contact you by phone, in person or by email at least annually to discuss your portfolio
- We generally require that you invest at least \$25,000 to obtain our asset management services

Retirement Plan Consulting Services

- NFP provides retirement plan consulting services to no-retail clients. Occasionally, if an employee leaves a plan, the may connect with an NFP advisor and engage NFP for asset management services listed above.

Our investment advice will cover a limited selection of investments. Other firms could provide advice on a wider range of choices, some of which might have lower costs.

For additional information about the services we offer, please visit our website at <https://www.nfp.com/retirement>.

Ask your financial professional:

- *Given my financial situation, should I choose a brokerage service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

Fees and costs affect the value of your account over time. The following summarizes the fees and costs you will pay for our advisory services.

Asset Management Services

- The amount you pay to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted directly from your account.
- Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the dollar value of assets in your account.
- You will pay fees to a broker-dealer or bank that will hold your asset such as custodian fees and account maintenance fees
- Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time.
- You pay our fees quarterly even if there are no transactions in your account.
- An asset-based fee may cost more than a transaction-based fee, but you may prefer an asset-based fee if you want continuing advice or want someone to make investment decisions for you.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

We are held to a fiduciary standard that covers our entire investment advisory relationship with you including monitoring your portfolio, investment strategy and investments on an ongoing basis, among other requirements.

When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- The more assets you have in your advisory account, including cash, the more you will pay us. Therefore, we have an incentive to increase the asset in your account to increase the amount we earn (i.e. recommending that you rollover your retirement plan account or transfer assets to our firm).
- We can charge clients different fees for the same investment strategy.

Ask your financial professional

- *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

- We compensate our financial professionals based on a salary as well as bonuses are based on the amount of client assets they service. The more assets you have in the advisory account, including cash, the more you will pay us and the more your financial professional will earn. Therefore, your financial professional has an incentive to increase the assets in your account to increase the amount he or she earns (i.e., recommending that you rollover your retirement plan account or transfer assets to our firm).
- We compensate our financial professionals based on the time and complexity required to meet a client's needs. Therefore, your financial professional has an incentive to maximize the time spent to increase the amount he or she earns.
- Your financial professional may be associated with a broker-dealer and may be associated with one or more insurance agencies or firms. If you purchase or invest in a commissionable investment through the broker-dealer or an insurance product through your financial professional, the broker dealer or insurance firm(s) will provide additional compensation to your financial professional. You will receive a separate Form CRS for broker-dealer business.
- Your financial professional can earn non-cash benefits from certain product sponsors such as free conferences, repayable or forgivable loans, technology, marketing support, other non-cash compensation. Therefore, your financial professional has an incentive to invest in those products whose sponsors provide the non-cash benefits.

Ask your financial professional

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?*

Does the firm or our financial professionals have legal or disciplinary history?

Yes. For information about our disciplinary history, please visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Ask your financial professional

- *Does the firm or your financial professionals have a disciplinary history? For what type of conduct?*

If you would like additional information about our services or a copy of this relationship summary, please call (800) 959-0071 or visit our website at <https://www.nfp.com/retirement>.

Ask your financial professional

- *Who is my primary contact person?*
- *Is he or she a representative of an investment adviser or a broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*

Item 2 - Summary of Material Changes

In this “Summary of Material Changes” the Adviser discusses only the material changes since the last annual update of this brochure in March 2019.

Material changes from the previously filed ADV Part 2 is to disclose a new dba name and update information on certain Investment Adviser Representatives Part 2B.

No Material Changes

Delivery of Amendments to this Brochure.

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

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

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

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Item 4 - Advisory Services

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

Investment Advice (Plan Level)

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

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

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

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

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

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

Investment Management (Plan Level):

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

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

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

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

Employee Plan and Investment Education

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

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

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

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

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

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

Plan Service Provider Proposal Research and Analysis

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

Newsletter Campaign

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

Market Review

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

Plan Design Guidance

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

Management of Conversion Process

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

Fiduciary Plan Review

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

General Plan Consulting Services

NFPR will assign a Plan Adviser, who is responsible for responding to ongoing questions, concerns, and issues raised by the Adviser that are related to Client's qualified or non-qualified retirement plan.

Services include plan pricing and contract negotiation by the incumbent provider and Client, recommendations of specific service and product enhancements, facilitation for the solution of service, administrative, and recordkeeping issues, plan compliance assistance and guidance, and ongoing problem solving. NFPR may provide a "help email" address, and "1-800" phone consultation assistance for participants.

404(c) Audit

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

Fiduciary Role under ERISA

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

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

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

section. The Adviser will not be responsible for investment decisions made by the Plan participants with respect to the investment of their accounts.

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

Portfolio Management

Some Investment Adviser Representatives of the Adviser perform investment management services for portfolios of their clients. The nature of the portfolios is limited primarily to mutual funds and ETFs but may have some individual securities as well. Additionally, some IARs utilize an automated advisory service which maintains model asset allocations by automatically generating trades. This automated service is through Schwab who also maintains custody of these assets. The Investment Adviser Representatives manage the portfolios on a discretionary basis and on a case by case basis may undertake a non-discretionary account. The Investment Adviser Representatives are responsible for the maintenance and rebalancing of the portfolio accounts in addition to communicating with the clients on the performance of their portfolio. The portfolio management accounts are with Charles Schwab and Fidelity as custodians and the Adviser does not maintain custody of client funds or securities in the provision of this service other than as noted in Item 15 - Custody.

Investment and Financial Consulting

Some Investment Adviser Representatives of the Adviser perform investment and financial consulting to individuals. The service provides general guidance based upon an evaluation of Client's goals and objectives furnished to Advisor as contemplated herein. Advisor shall make recommendations to purchase or sell securities consistent with those goals and objectives. These services may be purchased separately from other services provided by the Adviser and there is no obligation to purchase other services from the Adviser.

Product and Services Conflict of Interest

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

WRAP Programs

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

Tailored Relationships

The goals and objectives for each client are documented in investment policy statements that are created to

reflect the stated goals and objectives of the client. Clients may impose restrictions on investing in certain securities or investment products.

Assignment of Investment Management Agreements

Agreements may not be assigned without client consent.

Termination of Agreement

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

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

Investment Advice Assets

As of December 31, 2019 the Adviser advises on a total of \$52,705,691,456 on a non-discretionary basis and \$6,509,105,070 on a discretionary basis.

Item 5 – Advisory Fees and Compensation

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

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

Fee Structure

Asset-based Fee

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

Flat Fee

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

duration of services.

Per-participant Fee

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

Hourly Fee

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

Fees are paid in advance except when deducted from the Plan assets with approval of the client or when the client is billed directly or some combination of both. Fees are paid by the Plan or Plan Sponsor.

Clients are paying fees different than those above as they are based on historical fee schedules. Any fees paid in advance but are unearned shall be returned to the client prorated to the date of termination.

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

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

Portfolio Management Fees

The fees charged by the Investment Adviser Representatives range from .50% - 1.25% based on the nature of the services provided, the nature and composition of the portfolio and the frequency that the portfolio is expected to have to be rebalanced. The exact fee is based on the negotiated amount between the client and the Adviser. It is possible that clients are paying fees different than the above range due to historical fee schedules. The fees charged for the automated portfolio management service range from 0.30% - 0.50% annually. Investment management fees are collected quarterly or monthly and may be collected either in arrears or in advance. Payment in full is expected upon invoice presentation. Fees are deducted from the client account to facilitate billing as authorized by the investment management agreement. When fees are collected in advance, any unearned fees will be returned to the client upon termination.

Investment and Financial Consulting Fees

The fees for this service reflect the provision of the investment and financial consulting to individuals. The

Adviser will charge for these services either on an hourly or fixed fee basis. Hourly fees range from \$250 - \$350 and fixed fees generally range from \$1,000 to \$5,000 depending on the scope of services to be performed. Fees will be collected after services are delivered upon demand or quarterly if recurring. At the sole discretion of the Adviser, fees for these services may be offset wholly or partially with fees received from other sources for a client. This service is separate and distinct from other services provided by the Adviser and may or may not continue to be charged when client purchases other services from the Adviser based on the agreement between the Adviser and the client.

Other Fees

The client will likely incur fees from brokerages, custodians, administrators and other service providers. These fees are incurred as a result of managing a client account and are charged by the service provider. The amount and nature of these fees is based on the service provider's fee schedule(s) at the provider's sole discretion. These fees are separate and distinct from any fees charged by the Adviser.

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

Conflict of Interest Between Different Fee Structures

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

Item 6 - Performance Fees

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

Item 7 - Types of Customers

Retirement Plan Services

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

Portfolio Management Services

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

Account Minimums

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

Plan Services do not have a minimum dollar amount as the Adviser determines if the Plan is large enough for the Adviser's services may be provided in a manner that meets the needs of the Plan with respect to the Adviser's fiduciary obligation to the Plan.

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

Retirement Plan Services Strategies

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

Portfolio/Model Construction

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

Portfolio Management Strategies

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

Market, Security and Regulatory Risks

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

Market Risks:

Material Non-Public Information. By reason of their responsibilities in connection with other activities of the Adviser and/or its affiliates, certain principals or employees of the Adviser and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities.

The Adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

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

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

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

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

Regulatory Risks:

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

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

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

Security Specific Risks:

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

Currency: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Item 9 – Disciplinary Information

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

- Has been convicted of, or pled guilty or nolo contendere (“no contest”) to:
 - (a) any felony;
 - (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or
 - (c) a conspiracy to commit any of these offenses; Has been the named subject of a pending criminal proceeding that involves an investment- related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- Has been found to have been involved in a violation of an investment-related statute or regulation;
- Was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the client’s Adviser or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.
- Neither Adviser or an employee of Adviser have been or are currently involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Adviser or an employee of Adviser:
- Was found to have caused an investment-related business to lose its authorization to do business; or was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
- Denying, suspending, or revoking the authorization of Adviser to act in an investment-related business;
- Barring or suspending Adviser with an investment-related business;
- Otherwise significantly limiting Adviser investment-related activities; or imposing a civil money penalty of more than \$2,500 on Adviser.

Item 10 - Other Financial Industry Activities and Affiliations

Brokerage Affiliations

Some of the Adviser's Advisory associates are registered representatives of Kestra Investment Services LLC and may suggest that clients execute transactions through Kestra Investment Services LLC . If clients freely choose to execute transactions through Kestra Investment Services LLC , such Advisory representatives may receive the normal commissions and/or other compensation as sales agents resulting from any securities transactions, presenting associated persons with a conflict of interest.

Furthermore, in implementing an investment strategy through relationships maintained by associated persons, clients may pay commissions or fees that are higher or lower than those that may be obtained from elsewhere for similar services. Clients are advised that they are under no obligation to implement the plan or its recommendations through the associated persons in their capacities as registered representatives. Generally, these recommendations are based on the Adviser’s perception of the breadth of services offered, and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from elsewhere for similar services.

Under the rules and regulations of FINRA, Kestra Investment Services LLC, has obligations to maintain records

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

In order to fulfill its obligation, Kestra Investment Services LLC, has established a list of custodian and brokerage Advisers with which it has arranged to obtain the required cooperation, and which therefore may be utilized for custody of accounts directly advised either by registered representatives of Kestra Investment Services LLC, who are Investment Advisers or other Investment Advisory entities which are affiliated with registered representatives of Kestra Investment Services LLC. In certain instances, Kestra Investment Services LLC, will collect, as paying agent for the Adviser, the Investment Advisory fee remitted to the Adviser by the account custodian, and Kestra Investment Services LLC, will retain a portion as a charge to the Investment Adviser (not the client) for the functions Kestra Investment Services LLC, is required to carry out by FINRA. This fee will not increase execution or brokerage charges to the client or the fee the client has agreed to pay to the Adviser pursuant to the client's Advisory agreement. A portion of the fee retained by Kestra Investment Services LLC, may be re-allocated to other registered representatives of Kestra Investment Services LLC, who, as registered representatives of Kestra Investment Services LLC, are responsible for the supervision of other representatives and assist Kestra Investment Services LLC, with the functions described above.

Advisory Dual Registration

Some advisers are dually licensed as Investment Adviser Representatives with NFP and an affiliated firm flexPATH Strategies LLC (“flexPATH”). FlexPATH Strategies primarily provides these investment management services as a sub-advisor to certain pooled investment vehicles. Such pooled investment vehicles are typically organized as collective investment trusts (each, a “Trust”) by an unaffiliated third-party trustee (“Trustee”). The Trustee has the ability to establish different funds with differing investment objectives (each, a “Fund”) and to appoint an investment adviser with respect to the Funds. The Trustee hires and appoints Advisor to assist in implementing the glidepath models for the Funds, as provided by other unaffiliated investment adviser(s), and to manage the Funds in accordance with the established investment objectives.

The Adviser wholly owns two other advisory firms that currently maintain a separate and distinct registration after the transaction to acquire them was completed. These firms are SST Benefits and Consulting Services LLC and Fiduciary First LLC. As various requirements detailed in the transactions are met, these firms will migrate all clients under the NFP Retirement name and withdraw their separate registrations as an investment advisory firm. Until that time certain representatives are dually registered with one of these firms and with NFP Retirement Inc.

Plan Administration

NFP Retirement also offers retirement plan development, ongoing administration, and consulting. Services consists of plan design, development and implementation, ongoing administration, and consulting. Ongoing administration services can include preparing and filing required reports with government entities, the employer, and the employees; trust accounting; participant benefit statements and summary annual reports; employer administration reports; and more. NFP Retirement does offer 3(16) Plan Administration Fiduciary Services for certain clients. NFP Retirement can also include consulting on special projects, plan termination, audits, feasibility studies, and correction of plan documents and/or operational failures through approved procedures.

Affiliations

Some associated persons of the Adviser are insurance agents/brokers of various insurance companies. In such capacities, associated persons of the Adviser may receive normal commissions and/or other compensation associated with those activities. In addition, as registered representatives, associates may receive payments from

certain mutual funds distributed pursuant to a 12b-1 distribution plan or other such plans as compensation for administrative services, representing a separate financial interest on the Advisory associate's behalf. As such, a substantial conflict of interest may exist with respect to recommendations to buy or sell securities. The conflict is mitigated by the Adviser's procedure of netting 12b-1 fee payments out of the management fee the client is charged.

Affiliated Companies

Through common ownership the Adviser is closely affiliated with Retirement Plan Advisory Group (RPAG). RPAG provides back office and administrative solutions for other retirement plan Advisory groups. The firm is not involved in providing advice on or transacting securities. On some occasions either of the company may hold corporate events where the Adviser provides support and services and where product providers (i.e. mutual fund providers) may cover all or part of the cost of an event. RPAG reimburses the Adviser for its expenses related to such event support. This reimbursement is separate and distinct from any support received from product providers and is in no way dependent upon the existence of support from product providers.

Item II - Code of Ethics, Participation or Interest in Customer Transactions and Personal Trading

Code of Ethics

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

Participation or Interest in Client Transactions

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

Covered Person Personal Trading

The Chief Compliance Officer of the Adviser is Blake Bjordahl. He reviews all employee trades each quarter (except for his own trading activity that is reviewed by another principal or officer of the Firm) versus the Advisers Restricted List of securities. Issuers on the Restricted List require preapproval for Adviser personnel to transact upon in their own personal brokerage accounts. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential

treatment.

Item 12 - Brokerage Practices, Brokerage Recommendations

Retirement Plan Services

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

Portfolio Management Services

The Adviser has the authority over the selection of the broker to be used and the commission rates to be paid without obtaining specific client consent. The Adviser recommends brokerage firms (qualified custodians) such as Charles Schwab and Fidelity Investments ("Adviser Custodians"). As a result the Adviser receives some benefits, the primary one being access to the Adviser Custodians' website and downloads that communicate with the Adviser's software for portfolio management and other technology that enables Adviser to serve clients. Adviser Custodians provide periodic reports that address contemporary financial services issues and compliance newsletters that assist Adviser in maintaining an up-to-date compliance program. Adviser Custodians also may arrange group purchase discounts of some research subscriptions, but the value of those to Adviser are not significant as comparable discounts are available to advisers not using the Adviser Custodians.

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

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

Order Aggregation

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

technology provided by Schwab aggregates orders for the automated trading clients.

Directed Brokerage and Directing Brokerage for Client Referrals

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

Item 13 - Review of Fund Recommendations and Accounts

Review of Fund Recommendations

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

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

Review of Portfolio Management Accounts

Periodic Reviews

Account reviewers are the Investment Adviser Representatives responsible for each account. Account reviews are performed monthly by Adviser representatives. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client. The Compliance Officer conducts a quarterly review of trading activity and client accounts as a follow up measure to the representatives' reviews.

Review Triggers

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

Regular Reports

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

Item 14 - Customer Referrals and Other Compensation

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

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

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

Participation or Interest in Client Transactions

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

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

Referrals to Third Parties

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

Item 15 - Custody

The Adviser does not and cannot take custody of any Plan Client assets.

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

Upon review by the Adviser of its custodial agreements, it has determined that broad authority granted to the Adviser under its custodial agreements creates "inadvertent custody" despite the narrower authority of the advisory agreement between the Adviser and its portfolio management clients. This is particularly true where a client has a Standing Letter of Instruction ("SLOAs"). The Adviser and its custodians meet the seven conditions in the SEC No Action Letter as submitted by the Investment Adviser Association dated February 21, 2017 and therefore is not required to obtain internal controls or surprise account audits.

Item 16 - Investment Discretion

Retirement Plan Services

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

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

Portfolio Management Services

The Adviser contracts for limited discretionary authority to transact portfolio securities accounts on behalf of clients. Discretionary authority is granted either by the Adviser's investment management agreement and/or by a separate limited power of attorney where such document is required. The Adviser has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The firm's discretionary authority regarding investments may however be subject to certain limitations. These limitations are recognized as the restrictions and prohibitions placed by the Client on transactions in certain types of business or industries. All such restrictions are to be agreed upon in

writing at the account's inception.

At the Adviser's sole discretion, non-discretionary portfolio management clients may be accepted. The Adviser will consult with the client where discretion is not obtained prior to each trade in order to obtain client approval for the transaction(s).

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

Item 17 - Voting Customer Securities

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

Item 18 - Financial Information

The Adviser does not have any financial impairment that will preclude the Adviser from meeting contractual commitments to clients. The Adviser meets all net capital requirements that it is subject to and the Adviser has not been the subject of a bankruptcy petition in the last 10 years. The Adviser is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

NFP Retirement Inc. Privacy Policy

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

Safeguarding Client Documents

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

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

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

Sharing Nonpublic Personal and Financial Information

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

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

Opt-Out Provisions

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

BUSINESS CONTINUITY PLAN

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

CONTACTING US

If after a significant business disruption the client cannot contact us as the client usually does the client should call the Adviser's alternative number 949.460.9898 or access the Adviser web address www.nfp.com/corporate-benefits/retirement

OUR BUSINESS CONTINUITY PLAN

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

Our business continuity plan addresses: data back-up and recovery, all mission critical systems, financial and operational assessments, alternative communications with customers, employees, and regulators, alternate physical location of employees, critical supplier, contractor, bank and counter-party impact; regulatory

reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

VARYING DISRUPTIONS

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

FOR MORE INFORMATION

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



NFP Retirement, Inc.

dba 401(k) Advisers

dba 403(b) Advisers

Registered Investment Adviser

120 Vantis, Suite 400 Aliso Viejo, CA 92656

Phone: 949.460.9898

Fax: 949.460.9893

www.nfp.com/retirement

FORM ADV BROCHURE PART 2B (Item I)

This brochure provides information about principals and adviser representatives of NFPR and this brochure supplements the NFPR brochure. The client should have received a copy of that brochure. Please contact Joel Shapiro 949.460.9898 ext. 254 or by email at: joel.shapiro@nfp.com if the client did not receive the NFPR brochure or if the client has any questions about the contents of this supplement. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about the Adviser and its Investment Advisory representatives is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Education and Business Standards

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

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

Professional Certifications

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

Education and Business Backgrounds

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

James V. Adam, Investment Adviser Representative

Year of Birth: 1948

Education: Mankato State University - B.S Accounting (Magna Cum Laude), 1973

Professional Designation(s): N/A

Employment for the Past Five Years:

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

Employment Dates: 08//2005 to 04/2016
Firm Name: NFP Corporate Services, (MN).
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 06/2003 to 04/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

James Adam provides business consulting services through an entity he and his wife own, Adams Consulting. Adams Consulting's clients and those of NFP Retirement are mutually exclusive and therefore there is not conflict of interest in the provision of these services.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Thomas Bastin, Investment Adviser Representative

Year of Birth: 1964

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

Professional Designation(s): AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

CEBS®: Certified Employee Benefit Specialist. The candidate is required to take six mandatory courses which include two electives from CEBS curriculum. Examination type: Computer-based test for each course. Continuing Education: 30 hours every two years

Employment for the Past Five Years:

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Anthony Cardinal, Investment Adviser Representative

Year of Birth: 1967

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

Professional Designation(s): N/A

Employment for the Past Five Years:

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

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

Employment Dates: 12/1994 to 04/2016
Firm Name: NFP Corporate Services (MN)
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Anthony Cardinal is a partial owner of Anthony Cardinal & Page Nelson - Real Estate Investment, MSC Properties, LLC. – Commercial Real Estate Rental and Less Investment of Springfield, LLC. – an Investment Group for Grocery stores. Anthony Cardinal spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Anthony Cardinal is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Jonathan Coombs, Investment Adviser Representative

Year of Birth: 1983

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

Professional Designation(s): N/A

Employment for the Past Five Years:

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

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

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

Jonathan Coombs compensation is derived from flexPATH Strategies LLC.

Item 6 - Supervision

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

PHONE 949.460.9898 x 254;

EMAIL joel.shapiro@nfp.com

Joseph Delaney, Registered Investment Advisor

Year of Birth: 1998

Education: BBA in Finance from Loyola University Chicago December, 2019

Professional Designations: N/A

Employment for the Past Five Years:

Employment Dates: 01/2020 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Plan Advisor

Employment Dates: 08/2016 to 12/2019
Firm Name: Loyola University Chicago
Type of Business: Hospitality
Job Title & Duties: Prospective Student Host

Employment Dates: 05/2019 to 08/2019
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Intern

Employment Dates: 07/2018 to 08/2018
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Intern

Employment Dates: 05/2017 to 07/2017
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Intern

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Joseph Delaney nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Joseph Delaney is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Nicholas D. Della Vedova, President

Year of Birth: 1972

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

Professional Designation(s): N/A

Employment for the Past Five Years:

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

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

Employment Dates: 04/2004 to 04/2017
Firm Name: 401(k) Advisors, Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

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

investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

Nicholas Della Vedova is a partial owner of Hallendale, LLC. an Investment Property and is a partial owner of Fiduciary Retirement Plan Services, LLC. a Pension Related Service. Nicolas Della Vedova spends less than 10% of his time on both activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

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

Corwin Matthew Dickey, Registered Investment Advisor

Year of Birth: 1981

Education: Master of Business Administration, Texas Tech University 05/2005

Professional Designations: None

Employment for the Past Five Years:

| | |
|---------------------|--------------------------------|
| Employment Dates: | 10/2019 to Present |
| Firm Name: | NFP Retirement Inc. |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Plan Advisor |
| Employment Dates: | 03/2019 to 9/2019 |
| Firm Name: | City of Mount Dora |
| Type of Business: | Local Government |
| Job Title & Duties: | Finance Director |
| Employment Dates: | 9/2015 to 3/2019 |
| Firm Name: | City of Orlando |
| Type of Business: | Local Government |
| Job Title & Duties: | Treasury Manager - Investments |
| Employment Dates: | 10/2012 to 9/2015 |
| Firm Name: | Florida League of Cities |
| Type of Business: | Financial Services |
| Job Title & Duties: | Account Executive |

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Corwin Matthew Dickey is currently engaged as an officer in Mosaic Investment Group a NON Investment related entity. The amount of compensation earned on the above does not constitute more than 10% of his annual income and does not create any conflicts of interest with NFP Retirement.

Clients are under no obligation to purchase securities or Advisory services through Corwin Matthew Dickey nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

In the course of business Corwin Matthew Dickey does not receive economic benefit from non-clients for providing Advisory services.

Item 6 - Supervision

Corwin Matthew Dickey is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Marcel J. Dupré, Investment Adviser Representative

Year of Birth: 1967

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

Professional Designation(s): N/A

Employment for the Past Five Years:

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

Employment Dates: 08/2013 to 11/2014
Firm Name: Billeaud Capital Management Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Marcel J. Dupré is the sole owner of an Insurance Agency and 401(k) Guy LLC Insurance Clients are under no obligation to purchase insurance services through Marcel J. Dupré.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Jeffrey Elvander, Chief Investment Officer

Year of Birth: 1969

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

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 01/2015 to Present
Firm Name: FlexPATH Strategies
Type of Business: Investment Advisor
Job Title & Duties: Senior Vice President, CIO

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

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Steven Festler, Investment Adviser Representative

Year of Birth: 1986

Education: University of St. Thomas – MBA, 2014
Hamline University – Business Management with Economics minor, 2009

Professional Designation(s):

CRPS: Chartered Retirement Planning Counselor is a professional financial planning designation awarded by the College for Financial Planning. Individuals may earn the CRPC designation by completing a study program and passing a final multiple-choice examination. Successful applicants earn the right to use the CRPC designation with their names for two years, which can improve job opportunities, professional reputation and pay. Every two years, CRPC professionals must complete 16 hours of continuing education and pay a small fee to continue using the designation.

Employment for the Past Five Years:

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

Employment Dates: 04/2016 to 03/2019
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 03/14 to 04/2016
Firm Name: NFP Corporate Services, (MN).
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Account Manager

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities through Steven Festler.

Item 5 - Additional Compensation

In the course of business Steven Festler does not receive economic benefit from non-clients for providing Investment Adviser services

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Allison Flink, Investment Adviser Representative

Year of Birth: 1967

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

Designation(s):

AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); satisfy the Code of Ethics and Conduct

CPFA®: Certified Plan Fiduciary Advisor. A fiduciary advisor, by definition is an advisor who is paid on retainer by an employer to advise employees about their retirement plan investments- and possibly to provide a complete range of other products and service as well.

Employment for the Past Five Years:

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

Employment Dates: 08/2014 to Present
Firm Name: AKA Holdings, LLC.
Type of Business: Investment Adviser
Job Title & Duties: ICCO and Managing Member

Employment Dates: 07/2014 to 03/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

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

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

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

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 01/2015 to Present
Firm Name: FlexPATH Strategies
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

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

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

Item 5 - Additional Compensation

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

Item 6 – Supervision

Kellen Foley is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Christopher Giovinazzo, Investment Adviser Representative

Year of Birth: 1988

Education: UCLA 2007-2011, B.S. Political Science

Professional Designation(s):

AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

ARPC®: Accredited Retirement Plan Consultant (Society of Professional Administrators and Record Keepers). The SPARK Accredited Retirement Plan Consultant (ARPC) designation is awarded to sales and marketing professionals who have demonstrated the knowledge required to help employers sponsor plans that enable employees to effectively save and plan for retirement. The requirements for the designation are 2,000 hours of full-time industry experience, passing the ARPC exam. More information can be obtained at: <https://www.sparkinstitute.org/resources/education-center/spark-arpc-program/>

C(k)P®: Certified 401(k) Professional. Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course online - Mastery Curriculum Exam online, Candidate Designation Exam online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

CPFA®: Certified Plan Fiduciary Advisor. The Certification demonstrates knowledge, expertise and commitment to working with retirement plans. Plan advisors who earn their CPFA demonstrate the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities. The certification is issued by the National Association of Plan Advisors and applicants must pass a closed book Certified Plan Fiduciary Advisor exam. To maintain the certification advisers must pay an annual fee and complete 10 hours of continuing education.

Employment for the Past Five Years:

Employment Dates: 08/2018 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Investment Advisory Representative

Employment Dates: 08/2018 to Present
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer and Investment Advisor
Job Title & Duties: Registered Representative
DBA Fiduciary 401(k) Advisors

Employment Dates: 08/2018 to Present
Firm Name: Fiduciary Retirement Plan Services
Type of Business: Retirement Plan Advisory Services
Job Title & Duties: President. Service employer sponsored retirement plans

Employment Dates: 09/2012 to 08/2018
Firm Name: Transamerica Retirement Services.
Type of Business: Retirement Plan provider
Job Title & Duties: Sales Consultant

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Christopher Giovinazzo is President & Plan Advisor at FIDUCIARY Retirement Plan Services DBA Fiduciary 401(k) Advisors and a registered representative and/or investment adviser representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive investment advisory fees.

Clients are under no obligation to purchase securities or advisory services through Christopher Giovinazzo.

Item 5 - Additional Compensation

Christopher Giovinazzo's may receive compensation in connection with Fiduciary Retirement Plan Services and as a registered representative and/or investment adviser representative with Kestra Investment Services LLC

Item 6 – Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Matthew Giovinazzo, Investment Adviser Representative

Year of Birth: 1990

Education: University California – Los Angeles, 2013

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 04/2013 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

Employment Dates: 01/2015 to Present
Firm Name: FlexPATH Strategies
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 09/2013 to 07/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer and Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 09/2009 to 06/2013
Firm Name: University California – Los Angeles
Type of Business: College
Job Title & Duties: Student

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Vincent J. Giovinazzo, Chief Executive Officer

Year of Birth: 1959

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

Professional Designation(s): N/A

Employment for the Past Five Years:

Employment Dates: 12/2006 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Chief Executive Officer

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

Employment Dates: 01/2015 to Present
Firm Name: FlexPATH Strategies
Type of Business: Investment Adviser
Job Title & Duties: Chief Executive Officer

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Vincent J. Giovinazzo is a partial owner of Fiduciary Retirement Plan Services, LLC. a Pension Related Service. He spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

Vincent J. Giovinazzo is a principal of an affiliated firm flexPATH Strategies LLC which provides investment advice by allocating assets to other third-party investment advisers and managers

and the selection, termination, monitoring and review of such advisers and managers as a sub-adviser to pooled investment vehicles. flexPATH provides its third party management services to NFP Retirement and other clients.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Vincent J. Giovinazzo is supervised by Nicholas Della Vedova, President.

Nicholas Della Vedova's contact information:

PHONE 949.460.9898 x 246;

EMAIL nick.dellavedova@nfp.com

Allan Glad, Investment Adviser Representative

Year of Birth: 1953

Education: High School, Military Specialist 4 and Master Barber

Professional Designation(s): N/A

Employment for the Past Five Years:

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

Employment Dates: 03/2016 to 04/2018
Firm Name: Kestra Financial Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 03/2016 to 04/2016
Firm Name: NFP Corporate Services, (MN).
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Relationship Manager

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

Allan Glad is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Justin Goldstein, Vice President Advisory Services

Year of Birth: 1982

Education: University of Wisconsin – Whitewater, BA – Finance, 2008

Professional Designations: AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

Employment for the Past Five Years:

Employment Dates: 06/10/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: VP, Advisory Services

Employment Dates: 05/2017 to Present
Firm Name: Bronfman E.L. Rothschild Capital, LLC
Type of Business: Financial Institution
Job Title & Duties: Registered Representative

Employment Dates: 05/2013 to Present
Firm Name: Bronfman E. L. Rothschild Capital, LP
Type of Business: Financial Institution
Job Title & Duties: Senior Advisor

Employment Dates: 08/2012 to 09/2015
Firm Name: Baker Tilley Capital, LLC
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 08/2012 to 05/2013
Firm Name: Baker Tilly Investment Advisor LLC
Type of Business: Investment Advisor
Job Title & Duties: Senior Advisor

Employment Dates: 05/2010 to 08/2012
Firm Name: Various Insurance Carriers for W & R Insurance Agencies, Inc
Type of Business: Insurance
Job Title & Duties: Insurance Agent

Ryan Gresmer, Registered Investment Advisor

Year of Birth: 1982

Education: Hudson WI Senior High School Graduate, 2000

Professional Designations: N/A

Employment for the Past Five Years:

Employment Dates: 03/23/2020 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Registered Investment Advisor

Employment Dates: 11/15/2019 to 03/2020
Firm Name: Merrill Lynch, Pierce, & Fenner
Type of Business: Investment Advisor
Job Title & Duties: Financial Advisor

Employment Dates: 01/2019 to 03/2020
Firm Name: Bank of America
Type of Business: Financial Institution
Job Title & Duties: Financial Adviser- Trainee

Employment Dates: 08/2009 to 08/2018
Firm Name: US Bank
Type of Business: Financial Institution
Job Title & Duties: Bank, Relationship, Wealth Manager

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or advisory services through Ryan Gresmer nor are there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

In the course of business Ryan Gresmer does not receive economic benefit from non-clients for

providing Advisory services.

Item 6 - Supervision

Ryan Gresmer is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Ryan Hamilton, CFA

Year of Birth: 1991

Education:

University of California, Los Angeles
Bachelor of Arts- Psychology

Professional Designations: **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

| | |
|---------------------|---------------------------|
| Employment Dates: | 02/2020 to Present |
| Firm Name: | NFP Retirement Inc. |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Senior Investment Analyst |

| | |
|---------------------|---------------------|
| Employment Dates: | 05/2016 to 02/2020 |
| Firm Name: | NFP Retirement |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Investment Analyst- |

| | |
|---------------------|------------------------------|
| Employment Dates: | 10/2014-04/2016 |
| Firm Name: | Nicholas Pension Consultants |
| Type of Business: | Third Party Administration |
| Job Title & Duties: | Pension Administrator - |

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or advisory services through Ryan Hamilton nor are there any assurance that any transaction is at the lowest available cost.

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Item 5 - Additional Compensation

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

Item 6 - Supervision

Ryan Hamilton is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Jamie Hayes, Investment Adviser Representative

Year of Birth: 1979

Education: University of Michigan, BS Economics, 2001

Professional Designation(s):

C(k)P®: Certified 401(k) Professional. Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course online - Mastery Curriculum Exam online, Candidate Designation Exam online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

CPFA®: Certified Plan Fiduciary Advisor. A fiduciary advisor, by definition is an advisor who is paid on retainer by an employer to advise employees about their retirement plan investments- and possibly to provide a complete range of other products and service as well.

Employment for the Past Five Years:

Employment Dates: 9/2018 to Present
Firm Name: NFP Retirement, Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2011 – 09/2018
Firm Name: LPL Financial Corporation
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Investment Adviser Representative/Registered Representative

Employment Dates: 09/2006 to Present
Firm Name: Fiduciary First
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 4/2006 - 3/2011
Firm Name: SagePoint Financial, Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative/Registered Representative

DePaul University – MBA 1976

Professional Designation(s):

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

CFS®: Certified Fund Specialist has received a certification from the Institute of Business and Finance (IBF) for their expertise in mutual funds and the mutual fund industry. Training for the exam is by the IBF and the exam is designed to provide specialists with current market information on mutual funds, exchange-traded funds (ETFs), real estate investment trusts (REITs), closed-end funds and other similar retail investment offerings. It also includes material on advanced fund analysis and fund selection, asset allocation, portfolio construction, risk management, taxes and estate planning. Individuals must have a bachelor's degree or 2,000 hours of financial services work experience, complete a six-module self-study program and requires three proctored exams and a case study for completion. A CFS must complete 30 hours every two years of continuing education.

AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

CRC®: Certified Retirement Counselor® certification is a retirement specific certification program that creates recognition that retirement planning professionals have demonstrated a mastery of subject matter, made a commitment to the retirement planning profession and adherence to a code of ethics and continuing education. Eligibility for a CRC is having a Bachelor's degree or equivalent with two years relevant professional experience (within the past five years) or high school diploma or equivalent with five years relevant professional experience (within the past seven years); Passing a background check; passing a Certification exam and has Continuing Education Requirements of 15 hours per year.

Employment for the Past Five Years:

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

| | |
|-------------------|--|
| Employment Dates: | 06/2007 to Present |
| Firm Name: | SST Benefits Consulting & Insurance Services, Inc. |

bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

C(k)P®: Certified 401(k) Professional. Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course online - Mastery Curriculum Exam online, Candidate Designation Exam online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

Employment for the Past Five Years:

Employment Dates: 06/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 10/2007 to 06/2019
Firm Name: First Western Financial.
Type of Business: Investment Advisor
Job Title & Duties: Director or Retirement Plan Consulting

Employment Dates: 10/2006 to 10/2007
Firm Name: Mercer
Type of Business: Global Consulting
Job Title & Duties: Relationship Manager

Employment Dates: 06/1996 to 10/2006
Firm Name: Reber/Russell Company
Type of Business: Financial Institution
Job Title & Duties: Director of Retirement Plan Services

Employment Dates: 09/1984 to 06/1996
Firm Name: United Bank/Norwest
Type of Business: Employee Benefits/Investment & Trust
Job Title & Duties: Relationship Manager

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Paula Hendrickson

nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Paula Hendrickson is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

David Heroux, Investment Adviser Representative

Year of Birth: 1959

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

Professional Designation(s):

CRPS®: The Chartered Retirement Plans Specialist designation is issued by Financial Planning. No Prerequisites/Experience is required, Education Requirement: Online instructor led on self-study course. Examination Types: Final designation exam (online, closed-book, proctored). Continuing Education: 16 hours every two years.

C(k)P®: Certified 401(k) Professional. Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course online - Mastery Curriculum Exam online, Candidate Designation Exam online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

Employment for the Past Five Years:

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

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

David Heroux is the sole owner of Strat Holdings, Inc. - a Personal Investment in Income Producing Real Estate, a Director of Boys and Girls Club of Greater Conejo Valley, a 5013© Charity organization and an employee of TPA Services.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Thomas Heuer, Registered Investment Advisor

Year of Birth: 1996

Education: San Diego State University, Bachelor in Accountancy, 2019

Professional Designations:

CRPS®: The Chartered Retirement Plans Specialist designation is issued by Financial Planning. No Prerequisites/Experience is required, Education Requirement: Online instructor led on self-study course. Examination Types: Final designation exam (online, closed-book, proctored). Continuing Education: 16 hours every two years.

Employment for the Past Five Years:

Employment Dates: 02/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Plan Advisor

Employment Dates: 06/2018 to 07/2018
Firm Name: Frank, Rimmerman + Co. LLP
Type of Business: Certified Public Accountants
Job Title & Duties: Summer Intern

Employment Dates: 05/2017 to 02/2019
Firm Name: Xponential Growth Solutions
Type of Business: Financial Services/Marketing
Job Title & Duties: Assistant Project Manager

Employment Dates: 04/2015 08/2015 and 06/2016 to 08/2016
Firm Name: MOD Pizza
Type of Business: Fast Casual Pizza
Job Title & Duties: Employee

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Thomas Heuer nor are there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Emily Hopkins, Investment Adviser Representative

Year of Birth: 1986

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

Professional Designation(s): N/A

Employment for the Past Five Years:

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

Employment Dates: 12/2019 to present
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Emily Hopkins is a contractor for Flintridge Riding Club – a Private Membership Club. It is not an investment related business and she spends less than 10% of her time on activities related to that business, all outside of normal securities trading hours.

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

Emily Hopkins is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Year of Birth: 1970

Education: Community College of the Air Force, degree in Professional Aeronautics

Professional Designations: QKA: Qualified 401 (k) Administrator: The Qualified 401(k) Administrator (QKA) Credentialing Program is a credentialing program for professional's working in the financial field that are specializing in retirement planning and specifically 401k planning. The Qualified 401(k) Administrator Program allows the professional to attain a credential that will enhance their professional image and the quality of business they can provide to their clients. The Qualified 401(k) Administrator credential is offered for retirement plan professionals who work primarily with 401(k) plans. Applicants for the QKA credentials are from various professional disciplines. The QPA typically assist employers and consultants with the recordkeeping, non-discrimination testing and the administrative aspects of 401(k) and related defined contribution plans.

Employment for the Past Five Years:

Employment Dates: 06/11/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Senior Plan Advisor (AM)

Employment Dates: 06/2009 to Present
Firm Name: Bronfman E. L. Rothschild, LP
Type of Business: Financial Institution
Job Title & Duties: Manager

Employment Dates: 06/2006 to Present
Firm Name: Baker Tilly Capital, LLC
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clifton Horner is a 100% Owner of Cryptology Mining Business, LLC and a 50 % Owner of Rent Estate Investment. The amount of compensation earned on each of the above does not constitute more than 10% of his annual income and does not create any conflicts of interest with NFP Retirement. Clients are under no obligation to purchase securities or Advisory services through Clifton Horner nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Clifton Horner is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Alex B. Kahn, Investment Adviser Representative

Year of Birth: 1992

Education: The University of Pennsylvania, 2014

Professional Designation(s): N/A

Employment for the Past Five Years:

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

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

Employment Dates: 06/2014 to 03/2017
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: Student from 2006 to 2014

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information: PHONE 949.460.9898 x 254;
EMAIL joel.shapiro@nfp.com

Daniel Kallus, Investment Adviser Representative

Year of Birth: 1970

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

Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

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

Employment Dates: 07/2014 to 04/2017
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Daniel Kallus is a sole owner of Sunrise Shore, a Rental Property. It is not an investment related business and he spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

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

Geoffrey Keeling, Investment Adviser Representative

Year of Birth: 1971

Education: University of Texas, BBA

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

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

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

Employment Dates: 07/1012 to 01/2014
Firm Name: Econserve, LLC
Type of Business: Water Conservation Company
Job Title & Duties: Independent Contractor

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 – Supervision

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

Jeff Elvander's information:

PHONE 949.460.9898 x 238

EMAIL jeff.elvander@nfp.com

Richard Kruse, Investment Adviser Representative

Year of Birth: 1953

Education: University of Minnesota B.A, Business Communication, 1984
Post Graduate work in Finance and Accounting

Professional Designation(s): ChFC®: The Chartered Financial Consultant® designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience. The candidate is required to complete seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning; income taxation, investments and application of financial planning; as well as two elective courses involving the application of the aforementioned disciplines.

CLU®: The Chartered Life Underwriter® designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take a series of mandatory courses which include, for example, the following: insurance planning, life insurance law, fundamentals of estate planning, planning for business owners, income taxation, group benefits, planning for retirement needs, and investments.

CPA ®: Certified Public Accountant. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license (i.e., permit to practice) to practice public accounting. While the exam is the same no matter where it's taken, every state/jurisdiction has its own set of education and experience requirements that individuals must meet. Currently offered and recognized by all 50 states, the District of Columbia and four US Territories. Each state and jurisdiction has its own Board of Accountancy that grants CPA certification and licensure.

Employment for the Past Five Years:

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

Employment Dates: 11/2003 to 04/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 10/1984 to 04/2016
Firm Name: NFP Corporate Services, (MN)
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: President

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Richard Kruse is an owner and chief manager of Red Rock Properties, LLC, a real estate Development Company. Red Rock Properties, LLC has no business relationship or common clients with NFP Retirement, Inc.

Richard Kruse is the owner of Kruse Consulting, LLC. The business purpose of this company is to contract and provide services to NFP Retirement, Inc clients.

Clients are under no obligation to purchase securities or advisory services through Richard Kruse.

Item 5 - Additional Compensation

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

Richard Kruse receives compensation from Red Rock Properties and Kruse Constructions, LLC.

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Christopher David Langstaff, Investment Adviser Representative

Year of Birth: 1989

Education: Chapman University, Orange, CA, 2010

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

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

Employment Dates: 03/ 2015 to 01/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Bradley L. Larsen, Investment Adviser Representative

Year of Birth: 1963

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

Professional Designation(s): AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

C(k)P®: Certified 401(k) Professional. Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course online - Mastery Curriculum Exam online, Candidate Designation Exam online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

Employment for the Past Five Years:

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Vincent Learned, Investment Adviser Representative

Year of Birth: 1977

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

Professional Designation(s): CFA®: The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

Employment for the Past Five Years:

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

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

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

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Vincent Learned is the sole owner of Vincent Learned Rental Property in Nevada. It is not an investment related business and he spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

John L. Livingston, Investment Adviser Representative

Year of Birth: 1961

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

Professional Designation(s):

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

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

Employment for the Past Five Years:

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

Employment Dates: 07/2014 to 03/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

In the course of business John L. Livingston does not receive economic benefit from non clients for providing Advisory services.

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Jonathan Maertz, Senior Plan Advisor

Year of Birth: 1970

Education: Wisconsin Lutheran College with a Bachelor of Business Administration degree in Finance and Management, 1993

Professional Designations: CRPS® Chartered Retirement Plans Specialist

The Chartered Retirement Plans Specialist (CRPS®) designation is for financial professionals who design, install, and maintain retirement plans for the business community. Individuals who hold the CRPS® designation have completed ten modules of study, and successfully passed a closed-book, proctored exam, from the College for Financial Planning. CRPS® professionals must adhere to the College of Financial Planning's Standards of Professional Conduct and complete 16 hours of continuing education every two years.

AIF® Accredited Investment Fiduciary

The Accredited Investment Fiduciary (AIF®) designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® designation, financial professionals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor, and agree to abide by the AIF® Code of Ethics. In order to maintain the AIF® designation, the individual must annually renew their affirmation of the AIF® Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC.

CPFA® Certified Plan Fiduciary Advisor

The Certified Plan Fiduciary Advisor (CPFA®) designation is for financial professionals who have demonstrated the expertise required to act as a plan fiduciary or help plan fiduciaries managed their roles and responsibilities. Individuals who hold the CPFA® designation have completed the CPFA® course of study, and successfully passed a closed-book, proctored exam, from the National Association of Plan Advisors. CPFA® professionals must complete 20 hours of continuing education every two years.

Employment for the Past Five Years:

Employment Dates: 06/11/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Senior Plan Advisor (AM)

Employment Dates: 01/2017 to Present
Firm Name: Bronfman E. L. Rothschild, LP
Type of Business: Financial Institution
Job Title & Duties: Senior Advisor

Employment Dates: 01/2017 to Present
Firm Name: BELR Capital, LLC
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 04/2005 to 01/2017
Firm Name: Robert W. Baird
Type of Business: Financial Institution
Job Title & Duties: Retirement Plans Consultant

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Jonathan Maertz is a Director at The Lutheran Home Association an Assisted Living/ Nursing Home. The amount of compensation earned on the above does not constitute more than 10% of his annual income and does not create any conflicts of interest with NFP Retirement.

Clients are under no obligation to purchase securities or Advisory services through Jonathan Maertz nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

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

Lily Matias, Investment Adviser Representative

Year of Birth: 1965

Education: Columbia University/ Barnard College B.A. Economics, 1989

Employment for the Past Five Years:

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

Employment Dates: 11/2019 to Present
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

Employment Dates: 01/2013 to 10/2014
Firm Name: PFM Asset Management, Inc.
Type of Business: Investment Adviser
Job Title & Duties: Senior Managing Consultant

Employment Dates: 06/1992 to 06/2012
Firm Name: American Funds/Capital Group CO'S
Type of Business: Investment Adviser
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Lily Matias is a 100% owner of Norwex, USA, a Multi-Level Marketing Company specializing in manufacturing cleaning products intended to reduce harmful chemicals in our environment. Norwex is a NON Investment related entity. The amount of compensation earned on the above does not constitute more than 10% of her annual income and does not create any conflicts of interest with NFP Retirement.

Lily Matias is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that she may sell securities and receive customary securities commissions and receive investment advisory fees.

Clients are under no obligation to purchase securities or advisory services through Lily Matias.

Item 5 - Additional Compensation

In the course of business Lily Matias does not receive economic benefit from non clients for providing advisory services.

Lily Matias may receive compensation in connection with her registration as a registered representative and/or investment adviser representative with Kestra Investment Services, LLC.

Item 6 - Supervision

Lily Matias is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE
EMAIL

949.460.9898 x 254
joel.shapiro@nfp.com

Marc McDowell, Vice President Advisory Services

Year of Birth: 1962

Education: West Texas State University, Bachelor of Science degree: General Business, 1985.

Professional Designations:

AIFA: Accredited Investment Fiduciary Analyst is a certified person to perform fiduciary assessments on internal policies, procedures and workflows to verify or certify an entity's conformity to a "Global Fiduciary Standard of Excellence.

Employment for the Past Five Years:

| | |
|---------------------|-------------------------------|
| Employment Dates: | 06/11/2019 to Present |
| Firm Name: | NFP Retirement Inc. |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | VP, Advisory Services |
| Employment Dates: | 03/2016 to Present |
| Firm Name: | Bronfman E. L. Rothschild LP |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Registered Representative |
| Employment Dates: | 05/2013 to Present |
| Firm Name: | Bronfman E. L. Rothschild LLC |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Qualified Plan Advisor |
| Employment Dates: | 02/2007 to Present |
| Firm Name: | Baker Tilly Capital, Inc. |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Registered Representative |

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Marc McDowell is an employee of Bowling Ball Manufacturer. The amount of compensation earned on the above does not constitute more than 10% of his annual income and does not create any conflicts of interest with NFP Retirement.

Clients are under no obligation to purchase securities or Advisory services through Marc McDowell nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Marc McDowell is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

John Nelson, Registered Representative

Year of Birth: 1955

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

Employment for the Past Five Years:

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

Employment Dates: 03/2015 to 03/31/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

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

Employment Dates: 01/2013 to 03/2015
Firm Name: Meridian Retirement Plan Advisors
Type of Business: Retirement Plan Consulting
Job Title & Duties: President and Owner

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

John Nelson is a partial owner of Hazard Cyclesport, Inc, a bicycle shop, a Director at Youth

and Family Services, a nonprofit community organization and a joint owner of John and Peggy Nelson Rental Property with his spouse as the Manager.

Clients are under no obligation to purchase securities or advisory services through John Nelson.

Item 5 - Additional Compensation

In the course of business John Nelson does not receive economic benefit from non clients for providing advisory services.

Item 6 - Supervision

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

Nicholas D. Della Vedova's contact information:

PHONE 949.460.9898 x 246

EMAIL nick.dellavedova@nfp.com

Michael Nesheim, Investment Adviser Representative

Year of Birth: 1970

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

Professional Designation(s):

C(k)P®: Certified 401(k) Professional. . Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course, online Mastery Curriculum Exam, online Candidate Designation, Exam, online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

Employment for the Past Five Years:

Employment Dates: 07/2017 to Present
Firm Name: Benefits Exchange Alliance
Type of Business: Investment Adviser
Job Title & Duties: Chief Operating Officer/Financial Consultant

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Michael Nesheim is currently involved with Asset Financial Management - an Investment Advisor, is employed as a teacher at The Master University, Santa Clarita, is an Officer at Michael P. Rezinis Insurance Services, Inc and an employee at Benefits Exchange Alliance, an Insurance Agency.

Item 5 - Additional Compensation

Michael Nesheim receives compensation from Benefits Exchange Alliance Corporation, Michael P. Rezinis Insurance Services, Inc., from Access Benefits, Inc. and Assets Financial Management. In the course of business Michael Nesheim does not receive economic benefit from non-clients for providing advisory services.

Item 6 - Supervision

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

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

Kyle Olson, Investment Adviser Representative

Year of Birth: 1987

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

Professional Designation(s): CFA®: The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 02/2011 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

Employment Dates: 06/2011 to 07/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

Kyle Olson is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Kayla Pavela, Operations Coordinator

Year of Birth: 1996

Education: University of Wisconsin-Madison 2014 to 2018

Professional Designations: N/A

Employment for the Past Five Years:

Employment Dates: 06/17/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Operations Coordinator

Employment Dates: 01/2019 to Present
Firm Name: Bronfman E. L. Rothschild, LP
Type of Business: Investment Advisor
Job Title & Duties: Client Associate

Employment Dates: 05/2018 to 01/2019
Firm Name: Bronfman E. L. Rothschild
Type of Business: Investment Advisor
Job Title & Duties: Retirement Plan Advisory Intern

Employment Dates: 09/2017 to 01/2019
Firm Name: Independent Caregiver with Family
Type of Business: Healthcare
Job Title & Duties: Caregiver

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Kayla Pavela nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Kayla Pavela is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Frederick Pieracci, Investment Adviser Representative

Year of Birth: 1942

Education: St. Francis High School

Professional Designation(s): N/A

Employment for the Past Five Years:

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

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

Employment Dates: 03/1978 to present
Firm Name: Cape Star Company.
Type of Business: Insurance Company
Job Title & Duties: Director

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Frederick Pieracci is an officer and a partial owner of Cape Star Company, a Insurance Company. It is not an investment related business and he spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Frederick Pieracci is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Steven L. Prom, Investment Adviser Representative

Year of Birth: 1973

Education: St. Cloud State University - B. S. Finance
DePaul University - M.S. Finance

Professional Designation(s):

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

Employment for the Past Five Years:

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

Employment Dates: 08/2010 to 04/2018
Firm Name: Kestra Financial Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 07/2010 to 04/2016
Firm Name: NFP Corporate Services, (MN)
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Steven Prom is the sole owner of Investment Property, a 2 unit duplex otherwise Steven Prom is not currently engaged in any business or occupation for compensation in the financial industry or otherwise that provides a substantial source of income to Steven Prom or involves a substantial amount of Steven Prom's time.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Kimberly Dawn Pruitt, Investment Adviser Representative

Year of Birth: 1982

Education: University of Phoenix, Business Management. 2006

Professional Designation(s): C(k)P®: Certified 401(k) Professional. Prerequisites/Experience Required: Three years' experience in financial services. The candidate is required to take a series of mandatory courses; Final Exam for each course online; Mastery Curriculum Exam online, Candidate Designation Exam online and proctored. Educational Requirements; Approximately 142 hours of coursework. Continuing Education: 24 hours every 2 years.

Employment for the Past Five Years:

Employment Dates: 07/2015 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 06/2014 to 03/2017
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 03/2009 to 06/2014
Firm Name: Monolith Retirement.
Type of Business: Financial Institution
Job Title & Duties: Financial Adviser

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 – Supervision

Kimberly Pruitt is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Alissa Purko, Advisor Associate

Year of Birth: 1991

Education: University of Wisconsin Milwaukee – BBA, Finance

Professional Designations:

Employment for the Past Five Years:

Employment Dates: 06/11/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Investment Advisor Associate (Sales)

Employment Dates: 06/2014 to Present
Firm Name: Bronfman E. L. Rothschild, LP
Type of Business: Investment Advisor
Job Title & Duties: Client Support Coordinator

Employment Dates: 05/2013 to 05/2014
Firm Name: The Investment Center
Type of Business: Financial Institution
Job Title & Duties: Intern

Employment Dates: 01/2011 to 05/2014
Firm Name: UW-Milwaukee
Type of Business: Operations & Reservations
Job Title & Duties: Student

Employment Dates: 09/2011 to 08/2013
Firm Name: UW- Milwaukee Student Union
Type of Business: Operations & Reservations
Job Title & Duties: Set-Up Lead

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Alissa Purko nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Alissa Purko is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

John Richards, Vice President Advisory Services

Year of Birth: 1984

Education: St. Norbert College, Bachelor Degree in Accounting, 2007

Professional Designations: Chartered Financial Analyst: CFA®: The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 06/11/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: VP Advisory Services

Employment Dates: 03/2016 to Present
Firm Name: Bronfman E. L. Rothschild Capital, LLC
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 05/2013 to Present
Firm Name: Bronfman E. L. Rothschild LP
Type of Business: Financial Institution
Job Title & Duties: Senior Manager

Employment Dates: 12/2008 to Present
Firm Name: Baker Tilly Investment Advisors, LLC
Type of Business: Investment Advisor
Job Title & Duties: Wealth Advisor

Employment Dates: 11/2007 to 05/2013
Firm Name: Baker Tilly Virchow Krause LLP
Type of Business: Financial Institution
Job Title & Duties: Client Support Coordinator

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through John Richards nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Brian Roberts, Investment Adviser Representative

Year of Birth: 1963

Education: Davidson College; B.A. Economics with honors, 1986

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 02/2011 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 01/2011 to 08/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 10/2009 – 11/2011
Firm Name: Areté Investment Consulting
Type of Business: Consulting
Job Title & Duties: Owner

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

Brian Roberts is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

John David Roegner

Year of Birth: 1968

Education: MBA, Wake Forest University, Winston-Salem, NC
BA, North Central College, Naperville, IL

Professional Designation(s): AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

Employment for the Past Five Years:

Employment Dates: 08/2018 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Investment Advisor Representative

Employment Dates: 09/2017 to 01/2018
Firm Name: Clear Insight Benefits Consulting Inc.
Type of Business: Employee Benefits
Job Title & Duties: Consultant

Employment Dates: 09/2014 to 08/2017
Firm Name: Savant Capital Management
Type of Business: Investment Advisor
Job Title & Duties: Investment Advisor Representative

Employment Dates: 05/2013 to 04/2014
Firm Name: Southeast Investments, N.C., Inc.
Type of Business: Financial Services
Job Title & Duties: Registered Representative

Employment Dates: 05/2013 to 04/2014

Peter James Rowley, Investment Adviser Representative

Year of Birth: 1984

Education: Temple University 2002-2007

Professional Designation(s): N/A

Employment for the Past Five Years:

Employment Dates: 07/2018 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Advisory Representative

Employment Dates: 07/2013 to Present
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer
Job Title & Duties: Registered Representative

Employment Dates: 05/2013 – 07/2013
Firm Name: UCLA Facilities Management
Type of Business: University
Job Title & Duties: Administrative Assistant

Employment Dates: 08/2012 – 05/2013
Firm Name: SAP
Type of Business: Software Company
Title & Duties: Administrative Assistant

Employment Dates: 12/2009 – 02/2013
Firm Name: Fox Sport
Type of Business: Sports Media
Job Title & Duties: Writer

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 – Supervision

Peter Rowley is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Richard Sauerman, Investment Adviser Representative

Year of Birth: 1984

Education: Bachelor of Science, Samford University

Professional Designation(s): N/A

Employment for the Past Five Years:

Employment Dates: 06/2016 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 03/2016 to 06/2016
Firm Name: Rabobank Nederland
Type of Business: Wholesale Bank
Job Title & Duties: Credit Analyst

Employment Dates: 06/2011 to 03/2015
Firm Name: Quadrant Real Estate Advisers LLC
Type of Business: Investment Adviser
Job Title & Duties: Head of Global Research, Portfolio Manager

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Richard Sauerman is an Owner of RCD Dressage, LLC. a Horse Training Company and a partial owner of Toolshed Enterprises, LLC. a Woodworking Company. It is not an investment related business and he spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Peter J. Schmitz, Investment Adviser Representative

Year of Birth: 1974

Education: University of Minnesota, Twin Cities – B.S. Finance, 1998

Professional Designation(s): AIF®: The Accredited Investment Fiduciary designation requires one of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry. 1) Minimum of two years of relevant experience; a bachelor's degree (or higher); and a professional credential; 2) Minimum of five years of relevant experience; a bachelor's degree (or higher) or a professional credential; 3) Minimum of eight years of relevant experience. Additionally a candidate must: Enroll in and complete the AIF® Training; Pass the AIF® examination; Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues. The following steps must be completed annually in order to retain the AIF® designation: Accrue and report six (6) hours of continuing education (CE); Satisfy the Code of Ethics and Conduct Standards; Submit the application and dues.

CFA®: The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

Employment for the Past Five Years:

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

Employment Dates: 02/2016 to 04/2018
Firm Name: Kestra Financial Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 01/2016 to 04/2016
Firm Name: NFP Corporate Services, (MN).
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Relationship Manager

Employment Dates: 01/2014 to 01/2016
Firm Name: Cambridge Investment Research, Inc.

Stuart Scholten, Investment Adviser Representative

Year of Birth: 1990

Education: Thomas Edison State College, BS Business Administration and Management, General, 2012

Professional Designation(s):

CPFA®: Certified Plan Fiduciary Advisor. The Certification demonstrates knowledge, expertise and commitment to working with retirement plans. Plan advisors who earn their CPFA demonstrate the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities. The certification is issued by the National Association of Plan Advisors and applicants must pass a closed book Certified Plan Fiduciary Advisor exam. To maintain the certification advisers must pay an annual fee and complete 10 hours of continuing education.

Employment for the Past Five Years:

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

Employment Dates: 09/2012 to Present
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 06/2010 – 09/2012
Firm Name: Marriott Hotels
Type of Business: Leisure Industry
Job Title & Duties: Front Desk Agent

Employment Dates: 09/1995 – 06/2012
Job Title & Duties: Student

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Stuart Scholten is an Officer at Legacy Fitness, LLC – an online Marketing Company. It is not an investment related business and he spends less than 10% of his time on activities related to that business, all outside of normal securities trading hours. He is also an employee at Common Sense Events LLC, and Event Planning and Staffing Company, devotes 5 hours a week outside business hours and does not receive compensation.

Item 5 - Additional Compensation

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

Item 6 – Supervision

Stuart Scholten is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Joel Shapiro, Senior Vice President - ERISA Compliance

Year of Birth: 1969

Education:

- Tufts University, BA 1991
- Washington College of Law, at the American University, Juris Doctor J.D. 1994
- Georgetown University Law Center, Master of Laws LLM. 1995

Professional Designation(s): N/A

Employment for the Past Five Years:

| | |
|---------------------|--|
| Employment Dates: | 02/2006 to Present |
| Firm Name: | NFP Retirement Inc. |
| Type of Business: | Investment Adviser |
| Job Title & Duties: | Senior Vice President |
| Employment Dates: | 07/2014 to Present |
| Firm Name: | Kestra Investment Services, LLC. |
| Type of Business: | Broker Dealer/Investment Adviser |
| Job Title & Duties: | Registered Representative |
| Employment Dates: | 01/2015 to Present |
| Firm Name: | FlexPATH Strategies |
| Type of Business: | Investment Adviser |
| Job Title & Duties: | Senior Vice President - ERISA Compliance |
| Employment Dates: | 09/2016 to Present |
| Firm Name: | SST Benefits Consulting & Insurance Services, Inc. |
| Type of Business: | Investment Adviser |
| Job Title & Duties: | Senior Vice President - ERISA Compliance |
| Employment Dates: | 02/2006 to 04/2017 |
| Firm Name: | 401(k) Advisors, Inc. |
| Type of Business: | Investment Adviser |
| Job Title & Duties: | Investment Adviser Representative |
| Employment Dates: | 02/2006 to 07/2014 |
| Firm Name: | Financial Telesis Inc. |
| Type of Business: | Broker Dealer/Investment Adviser |
| Job Title & Duties: | Registered Representative |

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

Joel Shapiro is supervised by Nicholas D. Della Vedova, President.

Nicholas D. Della Vedova's contact information:

PHONE 949.460.9898 x 246

EMAIL nick.dellavedova@nfp.com

Jill Shea, Investment Adviser Representative

Year of Birth: 1970

Education: Scripps College of Claremont, BA International Relations, 1992

Professional Designation(s):

CPFA®: Certified Plan Fiduciary Advisor. The Certification demonstrates knowledge, expertise and commitment to working with retirement plans. Plan advisors who earn their CPFA demonstrate the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities. The certification is issued by the National Association of Plan Advisors and applicants must pass a closed book Certified Plan Fiduciary Advisor exam. To maintain the certification advisers must pay an annual fee and complete 10 hours of continuing education.

CEBS®: Certified Employee Benefit Specialist. The candidate is required to take six mandatory courses which include two electives from CEBS curriculum. Examination type: Computer-based test for each course. Continuing Education: 30 hours every two years.

Employment for the Past Five Years:

Employment Dates: 04/2013 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

Employment Dates: 03/2010 to 07/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 12/2007 – 03/2010
Firm Name: NRP Advisers
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 10/2006 – Present
Firm Name: Shea Retirement Services
Type of Business: Investment Adviser
Job Title & Duties: Principal and Owner

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Jill Shea is a volunteer at Woodbridge Village Association, a Home Owners Association. It is not an investment related business and she spends less than 10% of her time on activities related to that business, all outside of normal securities trading hours.

Item 5 - Additional Compensation

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

Item 6 – Supervision

Jill Shea is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Jason Schmudlach, Senior Plan Advisor

Year of Birth: 1980

Education: University of Wisconsin, Green Bay, Bachelor of Science In Accounting and Business Administration 2004

Professional Designations:

QKA: Qualified 401 (k) Administrator: The Qualified 401(k) Administrator (QKA) Credentialing Program is a credentialing program for professional's working in the financial field that are specializing in retirement planning and specifically 401k planning. The Qualified 401(k) Administrator Program allows the professional to attain a credential that will enhance their professional image and the quality of business they can provide to their clients. The Qualified 401(k) Administrator credential is offered for retirement plan professionals who work primarily with 401(k) plans. Applicants for the QKA credentials are from various professional disciplines. The QPA typically assist employers and consultants with the recordkeeping, non-discrimination testing and the administrative aspects of 401(k) and related defined contribution plans.

QPA: Qualified Plan Administrators is an independent third party retirement plan administration. QPA has been administering retirement plans since 1995 across 24 states. QPA can allow you to invest in multiple investment vehicles. The investment alternatives are available on either a plan level or a participant investment directed level.

Employment for the Past Five Years:

Employment Dates: 06/11/2019 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Senior Plan Advisor

Employment Dates: 04/2016 to Present
Firm Name: Bronfman E. L. Rothschild Capital, LLC
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 05/2013 to Present
Firm Name: Bronfman E. L. Rothschild LP
Type of Business: Financial Institution
Job Title & Duties: Manager, Retirement Plan Solutions

Employment Dates: 11/2011 to 04/2016
Firm Name: Baker Tilly Capital, LLC
Type of Business: Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 01/2004 to 05/2013
Firm Name: Baker Tilly Virchow Krause, LLP
Type of Business: Financial Institution
Job Title & Duties: Plan Consultant

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Jason Schmudlach nor is there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Jason Schmudlach is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Peter Alexander Snow, Investment Adviser Representative

Year of Birth: 1976

Education: Colorado State University, B.A. Economics, 2006
University of St. Thomas, MBA, Finance/Entrepreneurship, 2014

Professional Designation(s): **CFP®:** A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

Employment for the Past Five Years:

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

Employment Dates: 11/2006 to 04/2018
Firm Name: Kestra Financial Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 11/2006 to 04/2016
Firm Name: NFP Corporate Services, (MN).
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Investment Adviser Rep/Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or Advisory services through Peter Snow.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Peter Snow is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Matthew Stewart, Vice President, Advisory Services

Year of Birth: 1988

Education: University of Pittsburgh, Bachelor of Science (B.S.), Finance, 2012

Professional Designations:

Employment for the Past Five Years:

Employment Dates: 01/2020 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Senior Advisor, VP

Employment Dates: 09/2014 to 09/2020
Firm Name: American Portfolios
Type of Business: Financial Institution
Job Title & Duties: Financial Advisor

Employment Dates: 08/2013 to 08/2014
Firm Name: Morgan Stanley
Type of Business: Financial Institution
Job Title & Duties: Financial Advisor

Employment Dates: 04/2012 to 07/2013
Firm Name: American Portfolios
Type of Business: Financial Institution
Job Title & Duties: Financial Advisor

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Clients are under no obligation to purchase securities or advisory services through Matthew Stewart.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Matthew Stewart is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

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

Solomon Stewart, Investment Adviser Representative

Year of Birth: 1984

Education: MS in Financial Analysis and Investment Management from St. Mary's College of California, BS in Finance from the University of Arizona

Professional Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 04/2014 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

Employment Dates: 04/2010 to 07/2013
Firm Name: Blackrock
Type of Business: Investment Adviser
Job Title & Duties: Associate

Employment Dates: 12/2007 to 04/2010
Firm Name: RCM Capital Management
Type of Business: Investment Adviser
Job Title & Duties: Consultant Data Specialist

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 – Supervision

Solomon Stewart is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Donna Tamburelli, Registered Investment Advisor

Year of Birth: 1959

Education: BA, Western Maryland College/McDaniel College. 1981

Professional Designations: CFP

CFP®: A CERTIFIED FINANCIAL PLANNER™ designation is offered by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to candidates with at least a bachelor's degree and three years of full-time pertinent experience and that complete a CFP-board registered program or hold certain designations, including a CFA. CFP professionals must agree to be bound by the CFP Board's Standards of Professional Conduct and complete 30 hours of continuing education every two years.

Employment for the Past Five Years:

| | |
|---------------------|-----------------------|
| Employment Dates: | 08/03/2020 to Present |
| Firm Name: | NFP Retirement Inc. |
| Type of Business: | Investment Advisor |
| Job Title & Duties: | Senior Plan Advisor |

| | |
|---------------------|-------------------------------|
| Employment Dates: | 03/09/2015 to 07/31/2020 |
| Firm Name: | ANB Bank – Financial Services |
| Type of Business: | Financial Advisory Services |
| Job Title & Duties: | Retirement Plan Consultant |

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Donna Tamburelli with her husband Frank is a joint owner of Tamburelli Enterprises, Inc. a Profit Sharing Plan. She receives no compensation and there is no conflict of interest.

Clients are under no obligation to purchase securities or advisory services through Donna Tamburelli nor are there any assurance that any transaction is at the lowest available cost.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Donna Tamburelli is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Orlando Torres, Senior Adviser Representative

Year of Birth: 1980

Education: California State University Long Beach; Bachelor in Finance Professional, 2004

Designation(s): N/A

Employment for the Past Five Years:

Employment Dates: 03/2007 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

Employment Dates: 03/2007 to 07/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Orlando Torres is an Agent at Legacy Forms, Inc. a Trust Relates Services Company and as an Agent at Life and Fixed Annuities, an Insurance Company.

Item 5 - Additional Compensation

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

Item 6 - Supervision

Orlando Torres is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information: PHONE 949.460.9898 x 254
EMAIL joel.shapiro@nfp.com

William J. Tugaw, Investment Adviser Representative

Year of Birth: 1950

Education: Arizona State University; 1973; Bachelor of Science Degree in Business Administration.

Professional Designation(s): N/A

Employment for the Past Five Years:

Employment Dates: 09/2016 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Investment Advisory Representative

Employment Dates: 10/1997 to Present
Firm Name: SST Benefits Consulting & Insurance Services, Inc.
Type of Business: Investment Advisor
Job Title & Duties: Chief Compliance Officer Investment Advisory Representative

Employment Dates: 1/1998 to 12/1017
Firm Name: Dover Enterprises
Type of Business: Software
Job Title & Duties: President; Owner

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

William Tugaw is independently licensed as an insurance agent and may sell insurance products to clients and receive commissions when doing so. This is a potential conflict of interest, since commissions earned could be in addition to advisory fees earned in his capacity as an investment advisor representative. Clients are never obligated or required to purchase insurance products from or through Mr. Tugaw and may select any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

William J. Tugaw is an Investment Adviser Representative of an affiliated firm NFP Retirement, Inc. NFP Retirement, Inc. provides services to ERISA plan providers and portfolio management services to individual accounts.

Item 5 - Additional Compensation

William J. Tugaw does not receive any additional compensation from the insurance commissions previously described and is an Investment Adviser Representative of an affiliated firm NFP Retirement, Inc. NFP Retirement, Inc. provides services to ERISA plan providers and portfolio management services to individual accounts.

Item 6 - Supervision

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

Julie Ward, Vice President, Investment Adviser Representative

Year of Birth: 1967

Education: Oklahoma State University – B.S. in Marketing, 1989

Designation(s): N/A

Employment for the Past Five Years:

Employment Dates: 08/2001 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

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

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

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Julie Ward is a Board member at Texas Advisory Project-BOD, a nonprofit organization.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Pamela Watson, Investment Adviser Representative

Year of Birth: 1969

Education: B.A. Quantitative Economics and Decision Science, UC, San Diego, 1991

Designation(s): **CFA®:** The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct.

Employment for the Past Five Years:

Employment Dates: 04/2010 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Adviser
Job Title & Duties: Investment Adviser Representative

Employment Dates: 07/2014 to 01/2018
Firm Name: Kestra Investment Services, LLC.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Employment Dates: 05/2010 to 07/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer/Investment Adviser
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Ryan Williams, Investment Adviser Representative

Year of Birth: 1982

Education: Bachelor of Science degree, Texas Tech University, 2005

Designation(s): N/A

Employment for the Past Five Years:

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

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

Employment Dates: 09/2010 to 08/2014
Firm Name: 401(k) Concierge
Type of Business: Retirement planning services
Job Title & Duties: Education/Rollover Services

Employment Dates: 05/2012 – 08/2014
Firm Name: WFG Investments Inc.
Type of Business: Broker Dealer
Job Title & Duties: Registered Representative

Employment Dates: 10/2010 to 08/2014
Firm Name: Lone Star Retirement Services
Type of Business: Retirement planning services
Job Title & Duties: Education/Rollover Services

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Ryan Williams is the sole owner of Ryan Williams Insurance.

Item 5 - Additional Compensation

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

Ryan Williams receives compensation from Ryan Williams Insurance.

Item 6 - Supervision

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

PHONE 949.460.9898 x 254;

EMAIL joel.shapiro@nfp.com

Michael Steven Wilson, Investment Advisor Representative

Year of Birth: 1951

Education: Moorhead State University (B.A. Business Administration), 1973

Professional Designation(s):

LUTCF®: Life Underwriter Training Council Fellow. Currently offered and recognized by jointly issuing organizations; the College for Financial Planning and the National Association of Insurance and Financial Advisors (NAIFA). Qualification and Education requirements - Prerequisites: Members in good standing with NAIFA. Education: Three eight-week courses. Final exam for each course (online, proctored). Continuing Education: Three hours of ethics-related continuing education every two years for designees who earned their credential on or after 7/1/2019.

Employment for the Past Five Years:

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

Employment Dates: 10/2010 to 04/2016
Firm Name: NFP Corporate Services, (MN).
Type of Business: Broker Dealer/Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 10/2010 to Present
Firm Name: Kestra Financial Services, LLC.
Type of Business: Broker Dealer/Investment Advisor
Job Title & Duties: Registered Representative

Employment Dates: 01/2004 to 10/2010
Firm Name: ING Financial Partners, Inc.
Type of Business: Financial Institution
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

Michael Wilson is a registered representative with Kestra Investment Services, LLC. A potential conflict of interest exists in that he may sell securities and receive customary securities commissions and receive

investment advisory fees. Clients are under no obligation to purchase securities or advisory services through Michael Wilson.

Michael Wilson is a Sales Representative for ECA Marketing, a Insurance Company.

Item 5 - Additional Compensation

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

Item 6 - Supervision

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

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

Shane Michael Wolden, Investment Adviser Representative

Year of Birth: 1993

Education: Augsburg University – B.A. Finance, 2018

Professional Designation(s):

CRPS®: The Chartered Retirement Plans Specialist (CRPS) is a business-focused retirement plan advisor. CRPS professionals advise firms and help them implement and maintain retirement plans. The CRPS credential is awarded by the College for Financial Planning and requires rigorous study and passing a comprehensive written exam.

Employment for the Past Five Years:

Employment Dates: 08/2018 to Present
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Investment Advisor Representative

Employment Dates: 10/2015 to 08/2018
Firm Name: NFP Retirement
Type of Business: Investment Advisor
Job Title & Duties: Client Service Representative

Employment Dates: 10/2014 to 10/2015
Firm Name: Luther Brookdale Honda
Type of Business: Car Dealer
Job Title & Duties: Detailer

Employment Dates: 03/2014 to 08/2014
Firm Name: Holiday Stationstores
Type of Business: Retail Store
Job Title & Duties: Cashier

Employment Dates: 08/2013 to 03/2014
Firm Name: Unemployed
Type of Business:
Job Title & Duties:

Employment Dates: 08/2013 to 03/2014
Firm Name: Unemployed
Type of Business:
Job Title & Duties:

Employment Dates: 08/2010 to 08/2013
Firm Name: Maple Grove Lacrosse Association
Type of Business: Youth Organization
Job Title & Duties: Coach

Items 3 & 7 - Disciplinary Information

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

Item 4 - Other Business Activities

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

Item 5 - Additional Compensation

In the course of business Shane Wolden does not receive economic benefit from a person or entity who is not a client for providing advisory services.

Item 6 - Supervision

Shane Wolden is supervised by Joel Shapiro, Senior Vice President ERISA Compliance.

Joel Shapiro's contact information:

PHONE 949.460.9898 x 254

EMAIL joel.shapiro@nfp.com

NFP RETIREMENT, INC CLIENT RELATIONSHIP SUMMARY

NFP Retirement, Inc. (NFP) is an investment adviser registered with the Securities and Exchange Commission (SEC) that offers advisory accounts and services rather than brokerage accounts and services.

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. **Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.**

What investment services and advice can you provide me?

We offer Asset Management and Retirement Plan Consulting Services to retail investors.

Asset Management Services:

- We will provide you advice on a regular basis. We will discuss your investment goals and help you design a strategy to achieve your investment goals
- We will regularly monitor your account
- You can choose an account that allows us to buy and sell investment in your account without asking you in advance (a “discretionary account”) or we may give you advice and you decide what investments to buy and sell (a “non-discretionary account”). If you choose a non-discretionary account, you will make the ultimate decision to buy or sell an investment.
- We will review your account no less than annually and contact you by phone, in person or by email at least annually to discuss your portfolio
- We generally require that you invest at least \$25,000 to obtain our asset management services

Retirement Plan Consulting Services

- NFP provides retirement plan consulting services to no-retail clients. Occasionally, if an employee leaves a plan, the may connect with an NFP advisor and engage NFP for asset management services listed above.

Our investment advice will cover a limited selection of investments. Other firms could provide advice on a wider range of choices, some of which might have lower costs.

For additional information about the services we offer, please visit our website at <https://www.nfp.com/retirement>.

Ask your financial professional:

- *Given my financial situation, should I choose a brokerage service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

Fees and costs affect the value of your account over time. The following summarizes the fees and costs you will pay for our advisory services.

Asset Management Services

- The amount you pay to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted directly from your account.
- Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the dollar value of assets in your account.
- You will pay fees to a broker-dealer or bank that will hold your asset such as custodian fees and account maintenance fees
- Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time.
- You pay our fees quarterly even if there are no transactions in your account.
- An asset-based fee may cost more than a transaction-based fee, but you may prefer an asset-based fee if you want continuing advice or want someone to make investment decisions for you.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

We are held to a fiduciary standard that covers our entire investment advisory relationship with you including monitoring your portfolio, investment strategy and investments on an ongoing basis, among other requirements.

When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- The more assets you have in your advisory account, including cash, the more you will pay us. Therefore, we have an incentive to increase the asset in your account to increase the amount we earn (i.e. recommending that you rollover your retirement plan account or transfer assets to our firm).
- We can charge clients different fees for the same investment strategy.

Ask your financial professional

- *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

- We compensate our financial professionals based on a salary as well as bonuses are based on the amount of client assets they service. The more assets you have in the advisory account, including cash, the more you will pay us and the more your financial professional will earn. Therefore, your financial professional has an incentive to increase the assets in your account to increase the amount he or she earns (i.e., recommending that you rollover your retirement plan account or transfer assets to our firm).
- We compensate our financial professionals based on the time and complexity required to meet a client's needs. Therefore, your financial professional has an incentive to maximize the time spent to increase the amount he or she earns.
- Your financial professional may be associated with a broker-dealer and may be associated with one or more insurance agencies or firms. If you purchase or invest in a commissionable investment through the broker-dealer or an insurance product through your financial professional, the broker dealer or insurance firm(s) will provide additional compensation to your financial professional. You will receive a separate Form CRS for broker-dealer business.
- Your financial professional can earn non-cash benefits from certain product sponsors such as free conferences, repayable or forgivable loans, technology, marketing support, other non-cash compensation. Therefore, your financial professional has an incentive to invest in those products whose sponsors provide the non-cash benefits.

Ask your financial professional

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?*

Does the firm or our financial professionals have legal or disciplinary history?

Yes. For information about our disciplinary history, please visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Ask your financial professional

- *Does the firm or your financial professionals have a disciplinary history? For what type of conduct?*

If you would like additional information about our services or a copy of this relationship summary, please call (800) 959-0071 or visit our website at <https://www.nfp.com/retirement>.

Ask your financial professional

- *Who is my primary contact person?*
- *Is he or she a representative of an investment adviser or a broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*