

## Items 1: Cover Page

### IAM Financial, LLC

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This brochure was last updated on March 16<sup>th</sup>, 2022

This Brochure provides information about the qualifications and business practices of **IAM Financial, LLC**. If you have any questions about the content of this brochure, please contact us at 888-283-1392 or [info@iam-financial.com](mailto:info@iam-financial.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about IAM Financial, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search by a unique identifying number, known as a CRD number. The CRD number for IAM Financial, LLC is **146156**.

Registration with the SEC and other state securities as a registered investment advisor does not imply a certain level of skill and training.

## **Items 2: Summary of Material Changes**

In this Summary of Material Changes, we discuss the data updated in this Brochure since our last annual update, filed on February 18, 2021.

- Advisor updated the firm's East Lansing address. See the cover page of this brochure for additional information.
- Advisor updated the firm's wealth management fee and added project-based financial planning fee. See Item 5 for additional information.

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## Item 4: Advisory Business

### Our Firm's History

IAM Financial, LLC ("IAM Financial" or "Adviser") is a Michigan limited liability company that was formed in 2008 by Richard T. Feight, CFP® EA to serve clients looking for objective, affordable, independent financial advice. Using a *Holistic* approach, IAM Financial, LLC strives to integrate tax, investment, and financial planning advice to create an efficient financial plan, unique to the client's situation. IAM Financial, LLC is dedicated to the *Fiduciary Principle* that the client's best interest should remain paramount always.

### Our Principal Owner

Richard T. Feight, CFP® EA is the sole owner and managing member and Chief Compliance Officer of IAM Financial, LLC.

### Amount of Assets Under Management

As of December 31, 2021, IAM Financial managed \$36,931,595 in 22 non-discretionary accounts. The managed accounts are owned by individuals and high net worth individuals.

### Non-Participation in Wrap Fee Programs

IAM Financial does not sponsor or manage a wrap fee program.

### Advisor Services Offered

IAM Financial, LLC, offers two main services to new clients of the firm including:

1. Financial Planning and Wealth Management
2. Complimentary Newsletter

Prospective clients are offered a *complimentary one-hour consultation* to decide if the services of IAM Financial, LLC match their needs. Each of these services are described in further detail in this section. IAM Financial's Wealth Management service is generally available for clients with greater than \$1,000,000 of assets under advisement.

**Services Provided.** Generally, services provided under IAM Financial's Wealth Management start with *Financial* Planning to familiarize IAM Financial with the client's situation. IAM Financial's services to be provided will be agreed in the Adviser's Wealth Management Agreement and may entail some or all of the services listed below.

### Financial Planning

General in nature, or focused on an area of interest, financial planning depends on the client's needs. Advice and/or recommendations will be based upon information provided by the client, which the Adviser will deem reliable. Advice and/or services may be limited in scope. In such cases, the Adviser may not be able to consider all aspects of the client's financial situation. IAM Financial currently offers the following financial plans, analysis, and reviews:

1. **Retirement/Goal Plan** – The Adviser will consult with the client to help decide upon a reasonable set of personal financial objectives and time horizon for implementation. In addition, the Adviser will help identify and determine the best use of cash flow to reach goals including retirement. This plan is focused on numbers, including optimizing social security and identifying an ideal investment allocation. The Adviser can then assist the client in deciding upon a reasonable set of planning assumptions and financial forecasts moving forward.
2. **Investment Plan** – Taking into consideration the client's investment time horizon, plan targeted rate of return, asset allocation target and a cash flow needs, IAM Financial will also determines the most suitable investment mix based on your ability to withstand different levels of market fluctuation. IAM Financial primarily recommends exchange traded funds and no-load mutual funds as well as other low-cost investment vehicles, but will compares current and suggested investment return, risk (standard deviation), and expenses of all publicly traded investments, including investments held in 401(k), 403(b), or other qualified retirement plan accounts.
3. **Tax Analysis** – IAM Financial will offer to project tax scenarios to maximize the timing of taking pension, social security and other income streams, maximizes deductions to increase cash flow, and identifies inefficient investment and tax strategies.
4. **Insurance Analysis** – Analyzes insurance needs and financial risk exposures against your plan.
5. **Estate Review** – Review of account titles, beneficiary information, and estate documents.
6. **Cash Management Plan** - Identifies income, tax, and expenses to bring focus and awareness to cash flow.

**Implementation** - The Adviser can consult with the client to help determine a reasonable implementation schedule and assist with implementation which can include consolidating portfolios, selecting new investments and assistance to transfer assets to the selected discount broker.

## Wealth Management

Following the financial plan, Wealth Management clients receive the following services:

**Meetings.** Throughout the engagement, IAM Financial is available for consultations relating to wealth management topics as they relate to a client's financial and investment plan. Clients must communicate changes in their circumstances that impact their plan no less than annually as needed to review their current financial situation. To ensure a client's plan is up-to-date, IAM Financial is available to meet twice a year. The first meeting is a *Portfolio Review with Tax Preparation* (if requested). The second meeting is a *Financial Plan Review and Portfolio Review*.

**Portfolio Review** – IAM Financial monitors client portfolios no less than quarterly. Internal reviews may occur more frequently, at the Adviser's discretion, based on market conditions, as a result of significant deposits or withdrawals, a reported change in the client's circumstances, and other factors. The Adviser will conduct a client meeting to review current holdings against target allocations and returns used in your plan to determine if they're keeping pace with assumptions.

**Tax Preparation** – If requested by the client, depending upon the complexity, and if agreed at the time of engagement, IAM Financial will prepare the client's 1040 tax return as agreed in the Client Agreement.

**Financial Plan Reviews.** As established in the Client Agreement, the Adviser will provide the client with periodic updates relating to their financial plan. The timing of these updates will be guided by the scope and complexity of the plan. Reviews will address the following topics:

- **Plan Update** – Retirement and other goals are updated every year so that clients can see how current market conditions have impacted their plan.
- **Insurance Analysis** – Analysis of clients' insurance needs every two or three years to make sure that circumstances haven't changed warranting additional coverage.
- **Estate Plan Review** – Review every five years or so, to determine if there is a need to update account titles, beneficiaries, or other estate documents.
- **Cash Management Review** – As needed analysis for clients to review their spending habits against their income and tax situation.

**Reports.** IAM Financial offers quarterly reports and third-party monthly or quarterly reports to keep clients aware of their finances and provide checks and balances of proper reporting.

- **Performance Reporting** – Clients have access 24/7 to their portfolios performance over customized periods. Reports include such topics as market values, rates of return, interest and dividends, asset allocation, maturity and expiration alert, contributions, withdrawals and expenses, commissions, capital gains and losses.
- **Portfolio Cash Flow Reports** – Annual reports showing deposits, withdrawals, and account growth.
- **Monthly or Quarterly Statements** – Statements sent directly from account custodians to clients.
- **Net Worth Update** – A periodic updated snap-shot of clients' net worth to compare against previous year's net worth.

## Education

- **Quarterly Highlights Email** – Included with their quarterly updates reports, clients will receive an email highlighting a few areas of their reports.
- **Complimentary Quarterly Newsletter** – Also included with their quarterly updates reports, clients will receive a newsletter with an economic update and education article.
- **Blog Articles** – Periodic articles on IAM Financial's blog [www.ThinkingBeyondNumbers.com](http://www.ThinkingBeyondNumbers.com).
- **Micro Blog** – IAM Financial shares links to articles pertinent to clients' finances at [www.twitter.com/rfeight](http://www.twitter.com/rfeight).

## Miscellaneous Services Included

- **Same Day Call Back Policy** –IAM Financial makes an effort to ensure client calls are returned within one business day.
- **24 Hour Financial Emergency Response** – IAM Financial makes every effort to respond to client financial crisis within 24 hours with updates on resolution progress.
- **Second Opinion** – In addition to the services mentioned, Wealth Management clients are encouraged to ask IAM Financial for their opinion on any matter that may impact their personal finances. Paying off a mortgage, leasing or buying a car, utilizing an online money market, etc., are a few examples of questions clients have asked.

## Online Educational Courses and Content

IAM Financial provides online educational courses. The content of these courses will vary depending upon the needs of the attendees. Our sessions are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person's need nor do we provide individualized investment advice to attendees during our general sessions.

## Our Services are Tailored to Meet Client Stated Needs and Any Imposed Investment Restrictions

Advisory services are tailored to meet the needs of the individual client. Portfolios are individually designed. Financial, estate, tax, and risk management are generally delivered upon client engagement for such services. Planning issues are prioritized and addressed either at one time, or over the course of multiple meetings. After consultation with IAM Financial clients may impose reasonable restrictions on investing in certain securities or types of securities.

## Our Policies on Class Actions, Bankruptcies, and other Legal Proceedings

Clients should note that IAM Financial, LLC will not advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct IAM Financial, LLC to transmit copies of class action notices to the client or a third party. Upon such direction, IAM Financial, LLC will make commercially reasonable efforts to forward such notices in a timely manner.

## Item 5: Fees and Compensation

IAM Financial, LLC, offers **wealth management** based on a flat **retainer** or **percentage of assets under management** fee. IAM Financial, LLC can offer **financial planning** for a **flat fee rate**.

### Wealth Management & Financial Planning

IAM Financial, LLC's Wealth Management service is generally available for clients with greater than \$1,000,000 of assets under advisement.

IAM Financial, LLC's Financial Planning services are generally available to clients regardless of investable assets.

**Our Wealth Management Fees.** IAM Financial, LLC's annual fee for services set forth in IAM Financial, LLC's Wealth Management Agreement is charged as a percentage of assets under management, according to the schedule below. Fees are paid in advance in quarterly installments.

#### Market Value of Investments Fee Schedule

1.00% of the first \$1,000,000

0.50% of the balance over \$1,000,000

**How Wealth Management Fees are Calculated.** Billing amounts are based on the portfolio (securities and cash) value as of the annual anniversary date of 12/31, as determined by the client's custodian. If services are initiated at any time other than the start of a calendar quarter, fees will be pro-rated. In the absence of a market value, the fee will be based on the fair market value after the Adviser consults with two independent valuation sources (i.e., Shareholder's Service Group, Fidelity Institutional, or other custodians). Fees are agreed at the time of engagement.

**Minimum and Maximum Wealth Management Fees.** There is a minimum annual fee of \$10,000 for Wealth Management (which is \$2,500, billed quarterly and in advance). The minimum level of advised-upon assets to qualify for the advisory fee schedule is \$2,000,000. Should assets be less than the level of advised upon assets, the minimum retainer fee will apply. Given the minimum annual retainer fees, the potential exists for client accounts with lesser portfolio values to be charged unreasonable asset management fees. Given IAM Financial's fiduciary responsibility to clients, all fees will be disclosed relative to industry norms so that clients can make an informed decision before entering service. The minimum annual fee or minimum level of advised-upon assets may be waived at the discretion of IAM Financial if special circumstances exist such as an ability to meet the minimum account size within a reasonable timeframe, pre-existing relationships or at the Adviser's discretion.

There is no maximum amount of advised-upon assets or fees. Should the combined market value of the account(s) fall below the stated minimum, IAM Financial reserves the right to terminate or extend the relationship. If a client's situation should change materially such that the nature, scope and/or complexity of the Adviser's services change, IAM Financial may propose a fee change with 30-days' written notice (to amend the fee section of the Client Agreement). In such cases, the client is welcome to terminate services at any time. All fees are negotiable. Factors involved in negotiating fees include the client being related to an employee or independent contractor of IAM Financial, our desire to serve clients in need of assistance of IAM Financial's services and who otherwise cannot afford our services, the size of the relationship, whether future assets will be added to accounts upon which advice is provided, the level and type of advisory services provided and likely to be provided in the future, and the nature of the relationship between the Adviser and the client. Generally, IAM Financial does not charge fees on either employee accounts (repeat but above says will negotiate for employees) or those of immediate family members.

**When Wealth Management Fees are Paid.** Fees are billed and paid quarterly, in advance of the quarter, and are based on values of the financial assets upon which advice is provided as of the end of the year. To make sure clients are aware of the fees we charge, we will provide quarterly billing statements which detail the dollar amount charged, even though these amounts are withdrawn directly from the clients' account.

**Return of Unearned Fees upon Termination.** Should a client terminate his or her engagement with our firm during a quarter, for any reason, the fee for such quarter is prorated and the pro rata unearned amount is refunded to the client.

**Our Financial Planning Fees.** Fees are based on the complexity of the client's situation and scope of work involves, at the discretion of the advisor, and agreed-upon at the time of engagement. Fees are a fixed "quoted" fee agreed upon in advance. One half of the fee is charged in advance, with the balance due upon delivery of the plan. Work cancelled before completion is billed on an hours-actually-worked basis billed at \$450/hr.

Financial Planning fees generally range from \$3,000 to \$7,000, depending on the complexity and extent of the plan. Fees are to be paid by electronic funds transfer or check. No fee shall ever be received more than six months in advance of rendering the agreed upon service. All fees are negotiable.

All unearned and unapplied fees shall be refunded at once by IAM Financial, LLC to the advisory client. Service may be immediately terminated upon written notice by either party within five days of signature on the client agreement and no fee will be due.

Financial plans are not ongoing and therefore terminate upon delivery of the plan after any meetings to review the plan of been conducted. Should a client start out with this fixed fee arrangement and decide to become an annually retained client within the time of their contract, 1/2 the paid fees are used to offset the 1st year's annual retainer fee.

**Other Fees or Expenses Paid in Connection with Advisor Services: Products, Custodians.** All fees paid to IAM Financial, LLC for investment advisory and financial planning services are separate and distinct from the fees and expenses charged by mutual funds and exchange traded funds to their shareholders. Mutual fund and exchange traded fund expenses are generally described in each fund's prospectus. The expenses will generally include management fee, other fund expenses, and possibly a distribution fee. In addition, mutual funds and exchange traded funds incur transaction costs and opportunity costs, which are not disclosed in the fund's prospectus or State of Additional Information, but which may be estimated.

Clients will incur transaction fees or commissions in connection with trading of mutual funds, ETF, individual stock and bonds (and/or principal mark-ups and mark-downs for principal trades), which are charged by the custodian (brokerage firm holding safekeeping of the client's assets). Mutual fund and ETF transaction fees charged by our recommended custodian, Shareholder Service Group, generally vary from \$15.95 to \$35. The transactions costs for stock and bond trades vary. Accordingly, the client should review the fees charged by the funds (including transaction and opportunity costs within funds which are not included in a fund's annual expense ratio), the transaction fees charged by the custodian, as well as the fees charged by IAM Financial, LLC, to fully understand the total amount of fees and costs paid by the client, in connection with any recommended transaction. For a discussion of our practice in recommending brokers (custodians) to our clients, please see Item 12.



Clients may also incur "account termination fees" upon the transfer of an account from one brokerage firm (custodian) to another. The range of these account termination fees is believed to range generally from \$0 to \$200 at the present, but at times may be much higher. Clients should contact their custodians (brokerage firms, bank or trust company, etc.) to determine the amount of the account termination fees which may be charged and deducted from their accounts for existing accounts which may be transferred.

**Comparable Services.** IAM Financial, LLC believes that the charges and fees offered within its program are competitive with alternative programs available through other firms offering a similar range of services; however, lower fees for comparable services may be available from other sources. A client could invest in mutual funds directly, without the services of IAM Financial, LLC. In that case, the client would not receive the services provided by IAM Financial, LLC which are designed, among other things, to assist the client in determining which funds are most appropriate to each client's financial condition and objectives, undertaking a disciplined approach to portfolio management while considering the tax ramifications of same, and to avoid ad hoc emotions to shorter-term market events.

### **Online Educational Course and Content Fees**

IAM Financial, LLC's online educational courses and content fees vary from free to \$997 depending on the course/content being purchased.

### **Proper Management of Retainer and Percentage Based Compensation Conflicts of Interest.**

#### **Percentage Based Compensation Conflicts of Interest.**

The majority of our clients pay IAM Financial, LLC fees based on a percentage of assets we advise upon. This is a very common form of compensation for registered investment advisory firms and avoids multiple inherent conflicts of interest associated with commission-based compensation (IAM Financial, LLC does not accept commission-based compensation of any nature, nor does IAM Financial, LLC accept 12b-1 fees). Asset-advised-upon percentage method of compensation can still at times lead to conflict of interests between our firm and our client as to the advice we provide. Because our compensation is based on the amount of assets which we have under management, a conflict is created when our compensation could be enhanced based on our advice. This includes any situation that would increase the assets we manage. For example, conflicts of interest may arise relating to the following financial decisions in life: incur or pay down debt; gift funds to charities or to individuals; purchase of a (larger) home or cars or other non-investment assets; the purchase of a lifetime immediate annuity; expenditures of funds for travel or other activities; investment in private equity investments (private real estate ventures, closely held business, etc.), and the amount of funds to place in non-managed cash reserve accounts. Our goal is that our advice to you remains at all times in your best interest, disregarding any impact of the decision upon our firm.

This method of compensation does align our interest with yours, because our compensation increases when the assets we manage for your increase. However, our revenue also may be increased or decreased due to market fluctuations determined predominantly by economic factors beyond our control. These market fluctuations would not actually reflect the value we add to investment management. To counter these disadvantages, we will provide you with a comparison of market performance to the performance of your account using appropriate indices on an annual basis.

Also, since we are not directly compensated for other factors involved in comprehensive planning, such as tax planning, insurance planning, estate planning, goal setting, etc., it may be perceived that we are not diligent in fulfilling these obligations to you. To assure you of our professional diligence in these matters, we will review with you periodically the impact your investments have on your tax, insurance, and estate planning, as well as the progress toward your personal goals.

#### **Retainer Based Compensation Conflicts of Interest.**

Fixed retainer compensation (i.e. minimum annual fee clients with less than minimum asset to qualify for IAM Financial, LLC's percentage of assets-based fee) may conflict with a client's expectations since the advisor will be paid the same amount irrespective of the amount of work performed. To counterbalance this conflict, our firm offers the same level of services as clients that pay a fee based on a percentage of assets managed.

### **Application to All Services**

#### **Conflicts of Interest between Clients.**

IAM Financial, LLC's relationship with each client is non-exclusive; in other words, IAM Financial, LLC provides investment advisory services and financial planning services to multiple clients. IAM Financial, LLC seeks to avoid situations in which one client's interest may conflict with the interest of another of its clients. However, one circumstance which could arise is a downturn in values of one or more stock assets classes, thereby triggering the need to rebalance the investment portfolios. In this instance IAM Financial, LLC seeks to rebalance each client's investment portfolio on a timely basis. In ascertaining, which client portfolios to attend to first, IAM

Financial, LLC generally ranks clients in alphabetical order, and generally proceeds to rebalance portfolios as given permission via phone, email, or in person accordingly.

### **Cancellation and Termination of Advisory Agreements.**

Clients may cancel a new advisory agreement without penalty by providing written notice of such cancellation to IAM Financial, LLC within five business days of the date of signing an agreement. Beyond five business days of signing an agreement, the client can terminate the agreement at any time. IAM Financial, LLC agrees to furnish the client with all written work completed as of the date of termination and to refund the client, without penalty, the unearned portion of the annual fee (calculated pro-rata) that the client paid to IAM Financial, LLC. Termination of an agreement will not affect: (a) the validity of any action previously taken by IAM Financial, LLC under the agreement; (b) liabilities or obligations of the parties from transactions initiated before termination of the agreement; or (c) a client's obligation to pay advisor fees (prorated through the date of termination). Upon termination of the agreement, IAM Financial, LLC will not possess any obligations to recommend or take any action with regard to the securities, cash, or other investments in a client's account.

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

Item 6 is inapplicable to IAM Financial, LLC.

IAM Financial, LLC does not accept performance-based fees, nor does it manage accounts which impose performance-based fees.

Performance based fees are fees based on a share of capital gains or on capital appreciation of the assets of a client (such as a client that has a hedge fund or other pooled investment vehicle). Such acceptance or management would pose a significant conflict of interest to our clients because performance-based fees may provide an incentive to favor such accounts over the accounts of clients under our other advisory programs. IAM Financial, LLC considers avoidance of such conflict paramount policy in maintaining our fiduciary duty to our clients.

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

IAM Financial, LLC provides investment advice primarily to individuals and their families, including high net worth individuals, and trusts.

### **Required Minimum Client Assets under Advisement**

For Wealth Management Service clients, IAM Financial, LLC has a minimum level of assets of \$1,000,000. Minimums are subject to negotiation.

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

### **Generally**

IAM Financial, LLC provides the investment strategy and its implementation for clients using a variety of securities or pooled investment vehicles such as mutual funds or exchange traded funds. Clients of IAM Financial, LLC receive the benefit of IAM Financial, LLC's developed investment philosophies and strategies, research and due diligence, account monitoring, and personal financial planning recommendations.

Expansive academic research, investment information, and certain proprietary analyses are drawn on by IAM Financial, LLC to provide innovative investment advisory services.

Specific exchange traded funds, no-load (no commissions, no 12b-1 fees) mutual funds, and other investment products and securities are then recommended to clients. Clients' portfolios are periodically monitored, and changes to investment portfolios are suggested when appropriate. An opportunistic approach to rebalancing is employed in order to maintain desired risk tolerances, take advantage of market conditions, address specific client financial concerns, perform tax planning, and other reasons.

### **Methods of Analysis and Investment Strategies, Generally**

In designing investment plans for clients, IAM Financial, LLC relies on information supplied by the client and the client's other professional advisors. Such information may pertain to the client's financial situation, estate planning, tax planning, risk management planning, short-term and long-term lifetime financial goals and objectives, investment time horizon, and perceived current tolerance for risk.

This information becomes the basis for the tactical asset allocation plan which we believe will best meet the client's stated long term personal financial goals. The tactical asset allocation provides for investments in those asset classes which IAM Financial,

LLC believes (based on historical data and IAM Financial, LLC's proprietary analysis) will possess attractive combinations of return, risk and correlations over the long term.

A tremendous amount of academic research reveals that asset allocation is determinative of the majority of the expected long term gross returns of investor's portfolios. Our selection of asset classes is driven by research into global asset classes by such academics as Professor Eugene Fama, Sr. of the University of Chicago Booth Graduate School Of Business and the Center for Research in Security Prices, Professor Kenneth French of Dartmouth College, and many other academics and researchers.

The investment advice which IAM Financial, LLC provides is based on long term investment strategies which incorporate the principles of Modern Portfolio Theory. The utilization of several different asset classes as part of an investor's portfolio is emphasized, as this has been shown to reduce portfolio fluctuations (i.e. the standard deviation of the portfolio returns) over long periods of time. IAM Financial, LLC allocates and diversifies the client's assets among various asset classes and then among individual investments, following the suggested allocation agreed upon by the client.

IAM Financial, LLC's investment approach is firmly rooted in the belief that markets are fairly efficient (although not always rational) and that investors' gross returns are determined principally by asset allocation decisions. A focus is provided on developing and implementing globally diverse portfolios, mainly through the use of low-cost and tax efficient passively managed stock exchange traded funds.

Investment allocation and overall weightings between equities and fixed income investments are based on each client's needs and desires, perceived risk tolerance and the need to assume various risks, and investment time horizon. The portfolios of clients are customized to meet the specific circumstances of a client, the presence of investments in 401(k) or other accounts, as well as a perception of the client's understanding of the fundamental forces affecting risk and return in the capital markets.

In addition, a client's initial or revised tactical asset allocation may be influenced by a review of the relative valuation levels of various asset classes and the investment time horizon of that client. Asset class "bubbles" are attempted to be discerned when they occur, and tactical allocation changes may be employed.

Of course, no single theory or strategy can guarantee success.

Portfolio additions may be in cash or securities provided that the Adviser reserves the right to liquidate any transferred securities or decline to accept particular securities into the client's account. The Adviser may consult with its clients about the options and ramifications of transferring previously purchased securities when provided pre-notification of the client's intentions. In such cases, clients are hereby advised that when transferred and liquidated, these types of securities may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Clients may withdraw account assets on notice to the Adviser, subject to the usual and customary securities settlement procedures. The Adviser generally designs its client portfolios as long-term investments and assets withdrawals may impair the achievement of a client's investment objectives.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

## **Methods of Analysis; Sources of Information**

Our security analysis is based on many factors, including those derived from commercially available software technology, securities rating services, general economic and market and financial information, due diligence review, and specific investment analysis that clients may request. The main sources of information include commercially available investment information and evaluation services, financial journals, academic white papers and periodicals. Prospectuses, statements of additional information, other issuer-prepared information, and data aggregation services are also utilized. Various investment and financial planning conferences are also attended by IAM Financial, LLC's investment advisor.

## **Types of Investments**

Each client typically receives an investment portfolio which consists of mainly exchange traded funds (ETFs). The passively managed stock ETFs offer broad diversification, and most are structured for low turnover, so as to substantially lessen the often-considerable transaction costs incurred by active mutual funds as they trade securities within the fund. Consequently, total fees and costs of the ETF funds used by IAM Financial, LLC are believed to be generally lower than the total fees and expenses incurred by most other actively managed stock mutual funds when comparing funds in the same asset class.

Some investment portfolios may also include individual fixed income investments (bonds, CDs, etc.) and/or bond funds (primarily Vanguard). Clients' portfolios may also include individual equity securities, but these are generally part of the clients' investment holdings prior to becoming a client of IAM Financial, LLC.

Insurance products such as annuities and various types of life insurance products may also be evaluated. Clients may be recommended to invest in low-cost, no-load (no commission) variable or fixed deferred, or immediate annuities, when appropriate

to the circumstances and tax situation of the client. More often, this occurs when a client possesses an existing high cost variable annuity, and a rollover of the annuity is indicated, rather than redemption for tax planning purposes, to seek to lower the total fees and costs paid by the client and/or provide different investment choices. At times, clients may be advised to retain an existing annuity, previously purchased by the client, or undertake partial or full surrender of same (and/or tax-free exchanges), following an evaluation of the annuity contract, riders thereto, investment alternatives within the annuity and their fees and costs, including any surrender fees which may be imposed by the insurance company.

New clients' existing investments are evaluated considering the desired investment objectives. We work with new clients to develop a plan to transition from a client's existing portfolio to the desired portfolio. Investment advice may be offered on any investment held by a client at the start of the advisory relationship. Each client's portfolio holdings and asset allocation are then monitored periodically, considering the cash flow needs of the client. Review meetings with clients are held regarding their investment assets under advisement and other personal financial planning issues.

## **Risk of Loss, Generally**

Investing in securities involves a risk of loss that clients should be prepared to bear. The investment recommendations seek to limit risk through broad global diversification in equities (through broadly diversified stock exchange traded funds) and investment in high quality fixed income securities or diversified bond funds.

However, the investment methodology will still subject the client to declines in the values of their portfolios, which can at times be dramatic. We believe there exists a high probability in most market environments of a long term (15 year or greater) outperformance of small cap, relative to large cap stocks, and hence the stock (equities) portion of an investor's portfolio may emphasize toward small cap stocks. Accordingly, the normally greater than expected returns of the equity portion of the portfolio will in turn often permit the overall allocation to equities to be reduced, and the allocation to fixed income investments increased. IAM Financial, LLC believes this is the best manner to temper the shorter-term volatility of the stock market, especially for clients who derive cash flow from their portfolios.

Given the long-term nature of the expected equity premium (i.e. the additional expected return for investing in the overall stock market, relative to less "risky" US Treasury bills), and the long-term nature of the expected small cap effects, IAM Financial, LLC's investment philosophy is best suited for investors who desire a buy and hold strategy for a substantial portion of their funds. IAM Financial, LLC's stock exchange traded fund strategies are usually appropriate for clients possessing an investment time horizon of a minimum of ten years and preferable longer. Even then, investing is inherently uncertain as to future returns. While both macroeconomic and microeconomic risks are evaluated, for purposes of weighing risks and returns and for the computation of the expected returns of various asset classes (for use in financial planning decision making), IAM Financial, LLC does not generally engage in market-timing activities. IAM Financial, LLC believes that the equity small cap effects are highly likely to occur in the future, over long periods of time. However, there can be no assurance that these effects will occur in the future, over any given period. While IAM Financial, LLC seeks to reduce non-compensated risks to which a client may be exposed, other risks attain the client's longer-term financial goals and objectives; however, IAM Financial, LLC cannot provide any guarantee that the client's goals and objectives will be achieved.

## **Risk of Loss, Certain Higher Risk Securities**

Certain securities recommended, such as US small cap and mid cap stock exchange traded funds and similar pooled investments inside variable annuities possess a higher level of volatility (as individual asset classes within a portfolio). IAM Financial, LLC may use these securities as part of an overall asset allocation for a client, and when used, IAM Financial, LLC has a reasonable belief that the risk-return relationship for these securities will likely be beneficial for the investor over the long term.

Please also note that while all Certificates of Deposit (CDs) purchased for our clients are FDIC-insured, the pricing of certain of these CDs, which trade in the secondary market, can vary; accordingly, due to price declines and/or transactions costs associated with trading, these CDs could lose value if redeemed prior to maturity. When CDs are recommended to clients, it is with the intent that the client holds the CD to maturity.

## **Cash Balances in Client Accounts**

Cash in clients' investment accounts are typically swept into the bank or money market mutual fund accounts of the institutions (Shareholders Service Group). IAM Financial, LLC discusses upcoming cash flow needs with each client, during the time of review conferences and at other times and seeks to plan accordingly to meet those needs. While it is not our practice to encourage clients to maintain large amounts of cash in their accounts, such may be undertaken at the request of the client, to facilitate billing of IAM Financial, LLC's periodic fees, or for other reasons. Upon request of a client, cash balances will be maintained for temporary or short-term purposes.

Should the client desire a "cash reserve account," IAM Financial, LLC will assist the client to establish a separate, non-managed cash reserve account, which is not monitored thereafter by IAM Financial, LLC. IAM Financial, LLC will seek to review with the

client, during an annual net worth review, whether any funds are needed to restore cash reserves. IAM Financial, LLC excludes separate accounts established for cash reserve purposes in the calculation of IAM Financial, LLC's assets under advisement, and excludes the value of cash reserve accounts from a client's fee calculations.

## **Item 9: Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events of their firm or certain management personnel which would be material to your evaluation of IAM Financial, LLC, or the integrity of IAM Financial, LLC's management of your investment portfolio.

IAM Financial, LLC and its Managing Member have not been involved in any legal or disciplinary events. The Adviser and its Managing Member have not been involved in any criminal or civil actions; proceedings before the SEC or any other federal, state, or foreign regulator or self-regulatory authority. The Adviser's record does not reflect the existence of any data that would be material to a client's or prospective client's evaluation of IAM Financial or the integrity of its management. Information pertaining to the Managing Member and Adviser Representative(s) of the Adviser is located in Item 19 of this Brochure.

## Item 10: Other Financial Industry Activities and Affiliations

Richard T. Feight, CFP® EA offers tax preparation as a service.

IAM Financial is not an insurance agency and its Adviser Representatives are not insurance agents. The Adviser does not operate a hedge fund or any other pooled investment vehicle nor does the Adviser maintain a material relationship with a fund. In addition, the Adviser does not maintain licensing/registration relationships or a legal affiliation with any of the following:

- broker-dealer, municipal securities dealer, or government securities dealer or broker
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- other investment Advisor or financial planner
- futures commission merchant, commodity pool operator, or commodity trading advisor
- banking or thrift institution
- lawyer or law firm
- insurance company or agency
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships.

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

### We Seek to Avoid Material Conflicts of Interest

IAM Financial, LLC seeks to avoid material conflicts of interest. Accordingly, neither IAM Financial, LLC, nor its investment advisor representative receives any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

However, some additional services and non-direct monetary or other forms of compensation are offered and provided to IAM Financial, LLC because of its relationships with custodian(s) and/or providers of fund products. For example, IAM Financial, LLC's investment advisors may be invited to attend education conferences and/or entertainment events sponsored by such brokerage firms or custodians or fund companies. Other services may be provided as outlined below. IAM Financial, LLC believes that the services and benefits provided to it by brokerage firms (custodians) and fund providers do not materially affect the investment management recommendations made to clients of IAM Financial, LLC. However, in the interest of full disclosure of any potential conflict of interest, we discuss the possible conflicts herein.

Although IAM Financial, LLC believes that its methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to manage appropriately any material conflicts of interest that may remain, clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest.

### Our Code of Ethics

IAM Financial, LLC has adopted a Code of Ethics, to which all investment advisor representatives and employees are bound to adhere. The key component of our Code of Ethics states:

*IAM Financial, LLC and its investment advisor representative(s) and employees shall always:*

- *Act in the best interest of each and every client;*
- *Act with integrity and dignity when dealing with clients, prospects, and others;*
- *Strive to maintain and continually enhance our high degree of professional education regarding investment, financial, tax, estate, and risk management planning; and*
- *Seek always to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.*

IAM Financial, LLC further adopted a detailed Code of Ethics expressing the firm's commitment to ethical conduct, which is adopted by reference by IAM Financial, LLC, and which is utilized to guide our personal conduct. This detailed Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth our practices of supervising the personal securities transactions of employees with prior or concurrent access to client trade information.

*IAM Financial, LLC will provide a complete copy of the Code of Ethics to any client or prospective client upon request.*

## **Participation or Interest in Client Transactions and Personal Trading**

IAM Financial, LLC and its Adviser Representative do not have a material interest in any security. Should this change, IAM Financial, LLC and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest.

IAM Financial, LLC does not purchase securities for itself. Adviser Representatives and administrative personnel (if any) may have similar investment goals and objectives as our clients and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. However, IAM Financial and its Adviser Representatives acknowledge the Adviser's fiduciary responsibility to place the investment needs of clients ahead of the Adviser and its staff. The interests of clients are held in the highest regard. At no time will the Adviser, its Adviser Representatives or any related persons receive an added benefit or advantage over clients with respect to their personal securities transactions nor will they be permitted to place themselves in a position to receive added benefits as a result of advice given to clients. The staff of IAM Financial shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. In addition, IAM Financial has established trading policies for its access persons. Richard Feight, CFP® the Chief Compliance Officer of IAM Financial, is responsible for the monitoring of personal trading conducted by staff. The Advisor's staff shall report all required personal securities transactions to the Chief Compliance Officer as required by the State of Michigan. The Chief Compliance Officer will monitor and report his own trades. Potential concerns can be pre-reviewed with the Adviser's independent compliance counsel as needs arise. Reportable trades for this Adviser include all but the following exceptions:

Transactions effected pursuant to an automatic investment plan;

Securities held in accounts over which the access person has no direct or indirect influence or control;

Transactions and holdings in direct obligations of the Government of the United States;

Money market instruments — bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments;

Shares of money market funds;

Transactions and holdings in shares of mutual funds are not reportable, since the Advisor does not have a material relationship with an investment company which would otherwise require reporting;

Transactions in units of a unit investment trust are not reportable if the unit investment trust is invested exclusively in unaffiliated mutual funds.

All applicable securities rules and regulations will be strictly enforced. IAM Financial will not permit and has instituted controls against insider trading. Adviser Representatives and administrative personnel who do not follow the Advisor's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the SEC and/or state securities regulators.

The Code of Ethics includes our firms' policy prohibiting the use of material non-public information and protecting the confidentiality of client information. We require that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

## **Item 12: Brokerage Practices**

### **Use of Brokerage**

IAM Financial, LLC uses the services of Shareholders Service Group (SSG). IAM Financial, LLC is not affiliated with the SSG. SSG does not supervise IAM Financial, LLC, its agents or activities. SSG provides IAM Financial, LLC with access to institutional trading and custody services, which services are typically not available to retail investors. These services are generally available to independent investment advisors on an unsolicited basis and at no charge to them. However, not all independent investment advisors recommend their clients to use particular custodians.

While there is no direct linkage between the investment advice given and participation in SSG's service, economic benefits are received which would not be received if IAM Financial, LLC did not give investment advice to clients. The benefits provided by SSG include assistance with practice management and assistance with the management of client accounts, including but not limited to; (a) receipt of duplicate client confirmations; (b) receipt of electronic duplicate statements; (c) access to a trading desk serving investment advisor firms, and providing research, pricing information, and other market data; (d) access to practice management,



compliance updates, and best practice procedures via webinars; (e) access to financial planning software and research material; (f) access to other vendors (such as insurance or compliance providers, or providers of research or other materials) on a discounted fee basis through discounts arranged by the custodian; (g) permitting IAM Financial, LLC to access an electronic communications network for client order entry and to access client account information and which may otherwise assist IAM Financial, LLC with its back office functions, including recordkeeping and client reporting.

Participation in SSG's custodian program also provides access to certain mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors, such as the mutual funds of Dimensional Funds Advisors.

Generally, many of these services may be utilized to service all or a substantial number of our clients' accounts. Educational, research, or other services provided by SSG or mutual fund companies may benefit all of IAM Financial, LLC's clients, or may benefit only some clients.

### **Our recommendation of Brokerage Firms**

Clients are permitted to direct IAM Financial, LLC to utilize their desired brokers. However, if such brokers are used, IAM Financial, LLC may not have access to certain funds and other investments that are generally available at SSG, and commissions paid or transactions fees paid may be higher than the fees at SSG.

While as a fiduciary, IAM Financial, LLC endeavors to act in its clients' best interests, our desire that our clients maintain much of their assets in accounts at SSG may be based in part on the benefit to the firm of the availability of some products and services (previously described) at no cost to us, or at reduced costs, and not solely on the nature, cost, or quality of custody and brokerage services provided by the brokers, and this may create a potential conflict of interest. IAM Financial, LLC's clients may, therefore, pay higher transaction fees, commissions (for individual stock and ETF trades), and principal mark-ups and mark-downs (relating to purchases and sales on a principal, as opposed to an agency, basis), than those charged by other discount brokers. However, we have selected SSG for their generally low fees relative to large custodians. Also, please note that we prefer to recommend custodians that possess significant size and financial resources, for purposes of enhanced safety of clients' funds. For all of these reasons, the lowest cost custodian for clients may not be recommended to clients by IAM Financial, LLC.

### **Non-Aggregation of Client Trades**

IAM Financial, LLC has chosen to not aggregate (combine) the trades of its clients. This is due to the fact that all trade decisions are reviewed for near-term and long-term tax efficiency, which requires individual analysis of most trading decisions. This individual analysis of trades does not lend itself to computer software programs which could aggregate trades. As a result, IAM Financial, LLC's clients do not receive the benefits of reduced transaction fees such aggregations of trades might provide to our clients.

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

*Portfolio Reviews and Rebalancing* of client's portfolios, for the assets held under advisement with IAM Financial, LLC will be undertaken; (1) periodically as set for in the Wealth Management Agreement; (2) upon request, and (3) upon a substantial asset class decline, under the following adopted policies and procedures.

*Periodic Portfolio Reviews* are done by IAM Financial, LLC to determine if the value in any asset class has strayed significantly beyond initial target levels, and for purposes of meeting a client's cash flow needs. Even if one or more asset classes change, IAM Financial, LLC may determine not to rebalance the asset class for various reasons, such as avoidance of short-term capital gains, deferring long term capital gain realization, minimization of transaction costs, or our view on whether the asset class is under or overvalued relative to historical norms and our view of the level of the macroeconomic risks set forth below. Clients are only contacted in the event that rebalancing actions are recommended.

*Additional Portfolio Reviews* are done upon request by the client, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. IAM Financial, LLC will respond to such requests within a reasonable period.

Only no-load stock and bond and money market mutual funds and exchange traded funds may be sold or purchased by us in the event of such a portfolio rebalancing. Preference is given to purchasing additional shares in those investments which the client currently owns, unless for valid reasons we determine (avoiding wash sale rules, fund closing, etc.) that a substitute fund is, in our judgment, more appropriate.

We may also undertake sales and purchases during this time to capture tax loss harvesting, in addition to rebalancing actions.

In undertaking rebalancing actions, we will seek to rebalance one or more asset classes closer to the targets. We may decline to rebalance a specific asset class, due to tax concerns, high transactions costs relative to the trade amount, or other reasons.



We may estimate the market close at any point during the day during which trades are being made and undertake trades on that basis. Since the stock market is very volatile, especially in the last hour of trading, this may cause us to under or over estimate the amount needed to cause a rebalancing action.

### **Special Procedures for Major Market Change**

If there is a substantial decline in the valuation of the stock markets, generally, or a specific stock asset class, an opportunity may be presented for rebalancing of your investment portfolio. In such event, our resources may be limited given the number of relationships with our clients, especially if the downward change in value of the asset class occurs suddenly. IAM Financial, LLC will rebalance during this period based on the total amount of assets under advisement, with clients who possess higher assets under advisement given greater priority. There is no such assurance that we can rebalance all our client accounts on the same day, we will attempt to rebalance the account on the next business day.

### **Portfolio Reports Provided to Clients**

*Online Access to Account Information*, using a combination of secure online account aggregation and online data reporting services to provide updated account values and overall allocation as of the preceding business day for the assets held at SSG and retirement accounts (i.e. 401k, 403b). Retirement account reporting requires the client furnish such account aggregation service with any account passwords required to access account information. Passwords are not retained by IAM Financial.

In January or February of each calendar year, the client may be provided with a realized gains and loss report for any taxable accounts which are under advisement, to aid the client's CPA/accountant/tax preparer in income tax preparation.

While we are hopeful that the information supplied by custodians is accurate, we cannot guarantee its accuracy.

*Monthly or Quarterly Statements from Shareholders Service Group (SSG)* are sent to the client directly from the corresponding brokers, banks, mutual funds, partnership sponsors, and/or insurance companies which hold the client's investments. These statements reflect the assets in the custodian's custody, along with confirmations of each transaction executed in the account(s), if desired by the client. For some custodians, the client may elect to receive these statements by e-mail rather than U.S. mail.

**Clients are strongly encouraged to review the monthly and quarterly statements they receive from custodians.** Despite the best efforts of any firm to safeguard client's assets, fraud could still occur. While we hope that our clients trust our firm and advisor, and we have never had an instance of theft of client funds, we believe it is nevertheless important for clients to verify their investment holdings.

**We also encourage clients to timely compare the account statements received from us with those received directly from SSG or other custodians.** Should the client detect any unauthorized trading in an account, or unauthorized transfers of cash or securities, they are asked to contact Rich Feight, Chief Compliance Officer, toll free at 888-283-1392. Please note that we have never had any unauthorized withdrawals or transfers from our clients' accounts; your assistance in reviewing your monthly and/or quarterly account statements aids us in deterring any such activity in the future.

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

IAM Financial, LLC does not provide or accept compensation from any person for client referrals. Referrals to other professionals (i.e. accountants, insurance professionals, attorneys, etc.) may be done where appropriate to meet the client's needs. In these situations, IAM Financial, LLC recommends the client interviews referrals from others as well as those from IAM Financial, LLC to decide on a professional.

## **Item 15: Custody**

Execution and clearing services are provided by Shareholders Service Group (SSG). Clients will open their account(s) with SSG. Services and investment recommendations in connection to assets invested in a corporate retirement plans are limited to those offered within the plan and via the plan's contracted service providers. In all cases, clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities.

IAM Financial only has access to clients' custodial accounts to perform the following two services: 1) To withdraw the Adviser's contractually agreed Wealth Management fees, with the client's written authorization; 2) As part of IAM Financial's efforts to provide premium service and convenience to clients, the Adviser assists clients with standing letters of authorization (SLOAs) as required for clients to move funds in and out of their accounts. As a result, the adviser is deemed to have custody of these investment accounts. As of December 31, 2020, these services involved 25 clients with accounts totaling \$23,529,387. IAM Financial complies with the safe harbor provisions in the SEC's No-Action Letter dated February 21, 2017 (Investment Advisor Association).

It is the Adviser's policy not to accept physical custody of a client's funds or securities. All investment funds and stock certificates are to be sent by the client directly to the custodian.

IAM Financial, LLC is not affiliated with the SSG. SSG does not supervise IAM Financial, LLC, its agents or activities.

All clients receive account statements directly from their selected qualified custodians, such as a bank or broker-dealer that maintains those assets. You should carefully review these account statements and compare them to the quarterly or other reports we make available to you. We urge all of our clients to review their account statements in order to ensure that all account transactions, including deductions to pay advisory fees, remain proper, and to contact us with any questions. If it important for clients to promptly notify their custodial firm and IAM Financial if custodial statements are not being received.

## **Item 16: Investment Discretion**

IAM Financial, LLC does not accept discretion over clients' accounts. Before executing trades in client account(s) IAM Financial, LLC will discuss the advised transactions with the client. Verbal or written communication must be provided before any trades will occur.

## **Item 17: Voting Client Securities**

IAM Financial does not accept authority to vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Generally, clients will receive their proxies or other solicitations directly from the custodian or transfer agent. However, clients may call or email IAM Financial with questions regarding a particular proxy or other solicitation, and IAM Financial may provide advice to clients regarding clients' voting of proxies or such solicitations, upon request of a client or clients or in unusual circumstances.

When providing proxy advice to clients, the Adviser will disclose any significant relationship with the issuer, its affiliates or a security holder proponent of the matter on which proxy voting advice is given, as well as any material interest of the Adviser in the matter. The Adviser will not accept any special fee or remuneration for furnishing the voting advice from any person other than the security holder recipient thereof. The Adviser's voting advice will not be provided on behalf of any person soliciting proxies, or on behalf of a participant in an election contest subject to SEC Rule 14a-11. The Adviser will never communicate with the press concerning a particular proxy. IAM Financial does not solicit proxies and the Adviser recognizes that any deviations from these stated policies may require the Adviser to comply with SEC Proxy Registration Rules.

The Adviser will not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies.

## **Item 18: Financial Information**

IAM Financial, LLC does not require the prepayment of more than \$500 in fees per client and six months or more in advance. IAM Financial, LLC has never been the subject of a bankruptcy proceeding.

## **Item 19: Requirements for State-Registered Advisors.**

### **ADV 2B Brochure Information – Managing Member and Chief Compliance Officer**

#### **Education Background and Business Experience**

Richard T. Feight, CFP® EA is the managing member of IAM Financial. He graduated with a Bachelor of Art degree in Finance from the Eli Broad College of Business at Michigan State University in 1997. Rich attained the Certified Financial Planner™ (CFP®) designation in 2001. Year of birth: 1973

Business Background – Most recent 10 years:

IAM Financial, L.L.C., Managing Member and Chief Compliance Officer

Registered Investment Adviser

East Lansing, MI 1/2008 - Present

Additional Background. Prior to opening his own company in 2008, Rich was an Investment Adviser representative of Creative Financial Design for ten years (1997 to 2007). He began his career as a registered representative of Vestax Securities Corp. in 1997 where he was a fee-based Adviser. During that time, Rich was also licensed in the State of Michigan with Jackson National Life to advise and sell life insurance.

Richard Feight is also an Enrolled Agent, EA with the Internal Revenue Service (IRS). An Enrolled Agent is a federally authorized tax practitioner who has technical expertise in the field of taxation, and who is empowered by the Department of Treasury to represent tax payers before all administrative levels of the Internal Revenue Service for audits, collections, and appeals. Only Enrolled Agents, attorneys and CPAs may represent taxpayers before the IRS.

Enrolled Agents obtain their status by written examination or IRS experience. In 2011 Rich became an EA by demonstrating competence in tax matters and passing three comprehensive exams covering individual, business, and representation, practice and procedure aspects of taxation.

In addition to education, since 2004, Mr. Feight has subscribed to the stringent and mandatory annual educational hours, experience, and code of ethics to meet the requirements to be a NAPFA Registered Financial Adviser.

### **Other Business Activities**

Rich Feight devotes a portion of his time (up to 5% of his business-related time each year) researching, writing, traveling, and attending conferences in support of various industry organizations.

Rich currently serves on the National Association of Personal Financial Advisors' (NAPFA) National Board of Directors as Membership Director.

Previously, Rich served on NAPFA's Midwest Board of Directors as Membership Director from 2014 to 2016. Rich also served on the Small Business Association of Michigan's Strategic Communications Committee from 2010 to 2017. and the Financial Planning Association of Michigan's Board of Directors from 2001 to 2010 where he was President in 2009.

Rich served on the Transportation's Toastmaster's club 4776 from 2008 to 2010. He was President in 2009.

Rich is an instructor for the Aikido Yoshokai Association of North America (AYANA) and taught as an adjunct instructor at Lansing Community College from 2013 to 2017. Since 2013 he has taught a club instructor at Michigan State University. He is compensated from club dues for teaching 3 hours a week at MSU.

### **Additional Compensation**

Neither IAM Financial nor Richard T. Feight, CFP® receive compensation from any other sources for providing investment advice.

### **Performance-based fees**

IAM Financial's compensation is not "performance based" (based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract).

### **Disciplinary Information**

Richard T. Feight, CFP® and IAM Financial have never been involved in any of the following:

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person -

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;

3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person –

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
  - (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;
  - (b) barring or suspending the supervised person's association with an investment-related business;
  - (c) otherwise significantly limiting the supervised person's investment-related activities; or
  - (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

A self-regulatory organization (SRO) proceeding in which the supervised person –

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was:
  - (a) barred or suspended from membership or from association with other members, or was expelled from membership;
  - (b) otherwise significantly limited from investment-related activities; or
  - (c) fined more than \$2,500.

IAM Financial and Richard T. Feight, CFP® have never been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event. IAM Financial and Richard T. Feight, CFP® have never been named a party in a bankruptcy.

Any relationship or arrangement with an issuer of securities not listed in Item 10.C of ADV Part 2A

IAM Financial and Richard T. Feight, CFP® do not have any relationships or arrangements with any issuer of securities.

## Supervision

As the Managing Member and Chief Compliance Officer of IAM Financial, Mr. Feight has a vested interest in the Adviser's internal compliance and risk management program. The Adviser takes the issues of compliance and risk management seriously. IAM Financial's supervisory system establishes clear lines of authority, accountability and responsibility. Clients are welcome to contact Mr. Feight with questions or concerns in connection with the Adviser's internal compliance program. Mr. Feight's contact information is listed on the first page of this Brochure.

## DESIGNATION INFORMATION

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and several other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk

- management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.