

Eley-Graham Financial Advisory Services

*334 West 84th Drive
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219.736.6900

www.egfas.com

Disclosure Brochure

March 7, 2017

This brochure provides information about the qualifications and business practices of Eley-Graham Financial Advisory Services. If you have any questions about the contents of this brochure, please contact us at 219.736.6900. 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.

Eley-Graham Financial Advisory Services is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Eley-Graham Financial Advisory Services also is available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Material Changes

There have been no material changes to this Brochure since our most recent update dated February 12, 2016.

Eley-Graham Financial Advisory Services (“EG Financial, we, us, our, ours”) has offered or delivered information about our qualifications and business practices to clients on an annual basis. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of our last annual update of our brochure.

Currently, our brochure may be requested by contacting Richard Graham, President and Chief Compliance Officer, at 219.736.6900 or rgraham@egfas.com. Our brochure is also available on our website <http://www.egfas.com>. We will provide you with a new brochure at any time without charge.

Additional information about us is also available via the SEC’s website: www.adviserinfo.sec.gov.

The SEC’s website also provides information about any persons affiliated with EG Financial who are registered as investment adviser representatives of EG Financial. Information on our investment adviser representatives who work with your account can be found in the supplements to our brochure.

Eley-Graham Financial Advisory Services

CRD Number 121635

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Item 4: Advisory Business

EG Financial is a corporation organized under the laws of Indiana. Richard Graham founded the Merrillville, Indiana-based investment advisory firm in 1984 and is the principal owner. EG Financial is registered to do advisory business in the states of Illinois, Indiana and Texas.

Financial Planning Services

We provide a professional financial planning service to our clients. As part of the service, we organize your financial goals into an understandable financial plan to help you determine which direction you should take in order to best employ your available financial resources.

The plan generally includes financial statements indicating your financial condition together with planning concepts and investment advice. The concepts are designed to reduce taxes and protect against earnings interruptions, as well as premature death.

Our investment advice pertains solely to the financial plan. The financial plan is normally prepared for you one time, with semi-annual reviews conducted from then on. Significant changes in your investments or the size of your estate may require an update to your plan.

In the course of developing a financial plan, insurance, annuities, real estate, hard assets, oil and other non-security related matters may be discussed. This may include retirement options, owning or renting residential property, and leasing or purchasing vehicles and equipment.

You may also elect to engage us to perform a modified financial plan. A modified financial plan generally involves one or more of the following areas:

- Tax Planning
- Asset protection planning
- Retirement planning
- Estate planning or settlement
- Retirement plan asset allocation
- Consultation and research on other financial issues or estate settlement issues.

The design and establishment of a financial plan addressing asset protection, retirement, tax, or estate planning depends upon your individual circumstances. Estate planning may include the use of limited liability companies, corporations, grantor trusts, charitable trusts, living trusts, and/or private foundations.

Client Tailored Services and Client Imposed Restrictions

In managing your investment portfolio, we consider your financial situation, risk tolerance, investment horizon, liquidity needs, tax considerations, investment objectives, and any other issues important to your state of affairs. You should notify us promptly if there are any changes in your financial situation, investment objectives, or restrictions upon the management of your account.

Item 5: Fees and Compensation

We offer all of our services on a fee-only basis.

Fees for Financial Planning Services

Initial consultations are provided at no charge. Our comprehensive financial plans are billed according to the following schedule:

<u>Investment Assets</u>	Financial Planning Fee¹
\$150,000 to \$249,999	\$1,500-\$2,500
\$250,000 to \$499,999	\$2,500-\$3,500
\$500,000 to \$1,000,000	\$3,500-\$4,500
Over \$1 million	\$4,500-\$6,000+

¹ All fees are negotiable at our sole discretion and may vary according to the complexity of the project.

Fifty percent of the fee is due upon the beginning of the project. The remainder of the fee is due 30 days after you receive your financial plan. We anticipate that we will complete your financial plan within six weeks of starting. We encourage you to retain us on an ongoing basis for an annual review fee of \$300 per year or 20% of the initial plan development fee, whichever is greater.

The annual review fee is revised each year with the first report for the year and will increase at an annual rate of 4%.

Please note, the 4% increase is based upon the initial retainer fee not the value of your financial holdings. This fee is invoiced semi-annually.

A modified financial plan is billed at an hourly rate of \$175/hour for the financial advisor and \$75/hour for administrative staff.

We offer select financial planning services on a flat fee basis, generally \$350 or under. These services include consultation and research, estate settlement, or special studies. The services and the fees for those services will be described in the Service Fee Agreement.

Payment of Fees

We will provide an estimate of the total fee at the beginning of the project and you will be billed a deposit equal to at least one-half of the estimate. The balance is due upon completion and delivery of the financial plan. For estate settlement services, all fees are due upon completion of the service.

Either one of us may terminate our arrangement upon notice to the other. If the arrangement is terminated within 5 days of signing the financial planning agreement, the full amount of your fee will be returned to you. After that, you will be billed at the hourly rates stated above. Any over payment of fees will be promptly refunded, and any under payment of fees will be due immediately.

Other Types of Fees and Expenses

In addition to our fee, you may be required to pay other charges to implement your plan such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds (“ETFs”), and
- other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to or shared with us.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us.

Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us any questions you have about fees and expenses.

Please be sure to read the section entitled “Item 12: Brokerage Practices,” which follows later in this brochure.

Outside Compensation for Sale of Securities to Clients

Financial advisors of EG Financial are also registered representatives and investment adviser representatives of FSC Securities Corporation (“FSC”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through FSC, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the external expense fees (such as 12b-1 fees) charged by mutual funds.

Our financial advisors are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

Our financial advisors may also recommend various asset management firms through their affiliation with FSC. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Item 6: Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees.

Item 7: Types of Clients

We provide advisory services to individuals and high net worth individuals, including their trusts, estates and retirement accounts. As a condition for starting and maintaining an advisory relationship, we generally require minimum investment assets of \$150,000.

We, at our sole discretion, may accept clients with lesser assets based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the assets of your family members to determine if you meet our minimum requirement.

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

Methods of Analysis and Investment Strategies

We recommend specific investments for your portfolios through the use of fundamental analysis. Fundamental analysis is a method of evaluating a company that has issued a security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

Our investment strategies may include long-term and short-term purchases and sales. You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

Material Risks Involved

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

Although we develop your financial plan in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk.

Item 9: Disciplinary Information

We have not been the subject of any civil or criminal actions, an administrative proceeding before the SEC or any other regulatory agency, or a self-regulatory organization proceeding or other events that would be material to your evaluation of our business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

As explained under “Item 5: Fees and Compensation” above, our financial advisors are also registered representatives and investment adviser representatives of FSC, agents of various life insurance companies, and may share advisory fees from third-party asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

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

Code of Ethics

We have adopted a *Code of Ethics* (“*Code*”) to address the securities-related conduct of our financial advisors and employees. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser’s responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients and our fiduciary duty is the core underlying principal for our *Code*.

The *Code* includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our financial advisors and employees be conducted in a manner consistent with the *Code* and avoid any actual or potential conflict of interest, or any abuse of a financial advisor’s or employee’s position of trust and responsibility;
- that financial advisors may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the *Code* to you or any prospective client upon request.

Recommendations Involving Material Financial Interests

EG Financial, its owners and investment adviser representatives do not have a material interest in any securities.

Investing in the Same Securities

We do not buy or sell securities for our firm that we also recommend to clients. Our financial advisors and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by financial advisors and employees may raise potential conflicts of interest when they trade in a security that is:

- owned by you or
- considered for purchase or sale for you.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our financial advisors and employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in a financial advisor or employee receiving a better price than a client.

Financial advisors and employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Item 12: Brokerage Practices

EG Financial may recommend FSC to execute client account transactions. This may create a conflict of interest, as our financial advisors are also registered representatives of FSC, and therefore, receive compensation from FSC. Because the amount of our compensation or the products or services we receive may vary depending on the broker-dealer we recommend to be used by our clients, we have a conflict of interest in making that recommendation.

Our recommendation of FSC may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients.

Commissions and other fees for transactions executed through FSC may be higher than commissions and other fees available if you use another broker-dealer firm to execute transactions and maintain custody of your account. You are under no obligation to implement our recommendations through FSC.

Item 13: Review of Accounts

We perform an initial review of your overall financial condition and all specific financial planning areas for which you engage us. We offer a semi-annual review to determine if your investment and insurance portfolio is appropriate to meet your goals for retirement, disability or survivorship. The reviewers are our president, financial advisor, and/or a research assistant assigned to your account and the reviewer will document the review.

The reviews focus on the consistency of portfolio investments with your stated objectives and risk tolerances. Reviews also consider your individual investment restrictions, investment time horizons, liquidity needs, tax considerations and other circumstances which may be unique to you. Account reviews may also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement.

You will receive a report prepared by us which shows the market value of each investment and indicates whether you are “on target” to achieve your goals and objectives for portfolio balance, retirement, disability and survivorship. This report will be sent to you on no less than an annual basis, unless you notify us that you do not wish to receive it.

Item 14: Client Referrals and Other Compensation

We do not directly or indirectly compensate any person who is not one of our financial advisors or employees for client referrals.

We may refer you to Karen Robbins, CPA, for tax planning and consultation services. We may receive a referral fee from Ms. Robbins. You are under no obligation to use Ms. Robbins for any tax or accounting services.

Item 15: Custody

We do not have custody of your funds or securities. Financial plans are carried out by you through the broker-dealer of your choice.

Item 16: Investment Discretion

We do not manage securities accounts on behalf of clients. We provide you with a financial plan which is carried out in your sole discretion.

Item 17: Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In

addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

Item 19: Requirements for State-Registered Advisers

- A. Additional information about the education, business background and other business activities can be found in the brochure supplements that follow this section of the disclosure brochure.
- B. Other business activities are described in the “Other Financial Industry Activities and Affiliations” section of this brochure.
- C. Neither the firm nor any of its advisory representatives are compensated with performance based fees.
- D. Neither the firm nor its management have any relationship with an issuer of securities.

Richard E. Graham

Eley-Graham Financial Advisory Services

*334 West 84th Drive
Merrillville, IN
46410
219.736.6900*

Brochure Supplement

March 7, 2017

This brochure supplement provides information about Richard Graham that supplements the Eley-Graham Financial Advisory Services brochure. You should have received a copy of that brochure. Please contact Richard Graham if you did not receive Eley-Graham Financial Advisory Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Richard Graham, CRD Number 1076455, is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Richard E. Graham

Year of birth: 1949

Formal education includes:

- Attended Indiana University; 1968

Business background includes:

- Eley-Graham Financial Advisory Services, President (1984 – Present)
- FSC Securities Corporation, Registered Representative (1984 – Present)

Professional designation(s):

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 a number of 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 62,000 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:

- Bachelor’s Degree (or higher) from an accredited college university;
- Three years of full-term personal financial planning experience;
- Completion of a comprehensive program of study;
- Successful passing of a 10-hour exam; and
- Consent to be bound by the Standards of Professional Conduct, the ethical and practice standards for CFP® professionals.

After certification, continued use of the designation mandates 30 hours of continuing education every two years and on-going commitment to the ethical and practice standards.

Disciplinary Information

Richard Graham has not been the subject of any legal or disciplinary event over the past ten years.

Other Business Activities

In addition to his association with Eley-Graham Financial Advisory Services, Mr. Graham is a registered representative of FSC Securities Corporation, a registered broker/dealer. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Mr. Graham performs services for you as a registered representative of a broker-dealer, Mr. Graham may receive commissions or other compensation from the sale of mutual funds (such as 12b-1 fees) or other products to you. 12b-1 fees are paid by the mutual fund companies to Mr. Graham and are included in the expense ratios of the mutual funds. As a licensed insurance agent, Mr. Graham may also earn commissions from insurance products purchased from him by you.

This may present a conflict of interest because it creates an incentive to recommend investment and insurance products based upon the compensation received, rather than on your needs. Mr. Graham will explain the costs associated with any recommendations he makes. You are under no obligation to do business with Mr. Graham in any of these capacities.

Additional Compensation

Mr. Graham receives additional compensation for his activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above.

Supervision

Mr. Graham is supervised by Dorothy Austgen, Financial Advisor. Ms. Austgen can be reached at 219.736.6900.

We supervise Mr. Graham by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Graham gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established,
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Mr. Graham is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.

Karen S. Candiano

Eley-Graham Financial Advisory Services

*334 West 84th Drive
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46410
219.736.6900*

Brochure Supplement

March 7, 2017

This brochure supplement provides information about Karen Candiano that supplements the Eley-Graham Financial Advisory Services brochure. You should have received a copy of that brochure. Please contact Richard Graham if you did not receive Eley-Graham Financial Advisory Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Karen Candiano, CRD Number 2750502, is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Karen S. Candiano

Year of birth: 1956

Formal education includes:

- Attended Purdue University – North Central; 1992-1993

Business background includes:

- Eley-Graham Financial Advisory Services, Financial Advisor (2001 – Present)
- FSC Securities Corporation, Registered Representative (1996 – Present)

Professional designation(s):

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 a number of 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 62,000 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:

- Bachelor’s Degree (or higher) from an accredited college university;
- Three years of full-term personal financial planning experience;
- Completion of a comprehensive program of study;
- Successful passing of a 10-hour exam; and
- Consent to be bound by the Standards of Professional Conduct, the ethical and practice standards for CFP® professionals.

After certification, continued use of the designation mandates 30 hours of continuing education every two years and on-going commitment to the ethics and practice standards.

Disciplinary Information

Karen Candiano has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to her association with Eley-Graham Financial Advisory Services, Karen Candiano is a registered representative of FSC Securities Corporation, a registered broker/dealer. She is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Ms. Candiano performs services for you as a registered representative of a broker-dealer, Ms. Candiano may receive commissions or other compensation from the sale of mutual funds (such as 12b-1 fees) or other products to you. 12b-1 fees are paid by the mutual fund companies to Ms. Candiano and are included in the expense ratios of the mutual funds. As a licensed insurance agent, Ms. Candiano may also earn commissions from insurance products purchased from her by you.

This may present a conflict of interest because it creates an incentive to recommend investment and insurance products based upon the compensation received, rather than on your needs. Ms. Candiano will explain the costs associated with any recommendations he makes. You are under no obligation to do business with Ms. Candiano in any of these capacities.

Additional Compensation

Ms. Candiano receives additional compensation for her activities as a registered representative of a broker- dealer and as an insurance agent. This compensation is described under “Other Business Activities” above.

Supervision

Ms. Candiano is supervised by Richard Graham, Chief Compliance Officer. Mr. Graham can be reached at 219.736.6900.

We supervise Ms. Candiano by requiring that she adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Ms. Candiano gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established,
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Ms. Candiano is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.

Dorothy A. Austgen

Eley-Graham Financial Advisory Services

*334 West 84th Drive
Merrillville, IN
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219.736.6900*

Brochure Supplement

March 7, 2017

This brochure supplement provides information about Dorothy Austgen that supplements the Eley-Graham Financial Advisory Services brochure. You should have received a copy of that brochure. Please contact Richard Graham if you did not receive Eley-Graham Financial Advisory Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Dorothy Austgen, CRD Number 3263405, is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Dorothy A. Austgen

Year of birth: 1964

Formal education includes:

- Northern Illinois University: BS in Finance & Management – 1986

Business background includes:

- Eley-Graham Financial Advisory Services, Financial Advisor (2008 – Present)
- FSC Securities Corporation, Registered Representative (1999 – Present)
- Eley-Graham Financial Advisory Services, Advisory Assistant (1995 – 2008)

Professional designation(s):

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

- Bachelor’s Degree (or higher) from an accredited college university;
- Three years of full-term personal financial planning experience;
- Completion of a comprehensive program of study;
- Successful passing of a 10-hour exam; and
- Consent to be bound by the Standards of Professional Conduct, the ethical and practice standards for CFP® professionals.

After certification, continued use of the designation mandates 30 hours of continuing education every two years and on-going commitment to the ethics and practice standards.

Disciplinary Information

Dorothy Austgen has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to her association with Eley-Graham Financial Advisory Services, Dorothy Austgen is a registered representative of FSC Securities Corporation, a registered broker/dealer. She is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Ms. Austgen performs services for you as a registered representative of a broker-dealer, Ms. Austgen may receive commissions or other compensation from the sale of mutual funds (such as 12b-1 fees) or other products to you. 12b-1 fees are paid by the mutual fund companies to Ms. Austgen and are included in the expense ratios of the mutual funds. As a licensed insurance agent, Ms. Austgen may also earn commissions from insurance products purchased from her by you.

This may present a conflict of interest because it creates an incentive to recommend investment and insurance products based upon the compensation received, rather than on your needs. Ms. Austgen will explain the costs associated with any recommendations he makes. You are under no obligation to do business with Ms. Austgen in any of these capacities.

Additional Compensation

Ms. Austgen receives additional compensation for her activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above.

Supervision

Ms. Austgen is supervised by Richard Graham, Chief Compliance Officer. Mr. Graham can be reached at 219.736.6900.

We supervise Ms. Austgen by requiring that she adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Ms. Austgen gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established,
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Ms. Austgen is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.