

# Imber Financial Group, LLC d.b.a. Imber Wealth Advisors Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Imber Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at (734) 769-1719 or by email at [office@imberwealth.com](mailto:office@imberwealth.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 Imber Financial Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Imber Financial Group, LLC's CRD number is: 144846.*

955 W Eisenhower Cir Suite A  
Ann Arbor, MI 48103  
(734) 769-1719  
[office@imberwealth.com](mailto:office@imberwealth.com)

*Registration does not imply a certain level of skill or training. Version Date: February 20, 2025*

## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of IFG on 9/18/2024 are described below.

Material changes include:

The firm added updated assets under management under Item 4.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes .....	ii
Item 3: Table of Contents .....	iii
Item 4: Advisory Business.....	2
A. Description of the Advisory Firm .....	2
B. Types of Advisory Services .....	2
C. Client Tailored Services and Client Imposed Restrictions .....	4
D. Wrap Fee Programs.....	4
E. Assets Under Management .....	4
Item 5: Fees and Compensation.....	5
A. Fee Schedule.....	5
B. Payment of Fees.....	6
C. Client Responsibility for Third Party Fees.....	7
D. Prepayment of Fees .....	7
E. Outside Compensation for the Sale of Securities to Clients.....	7
Item 6: Performance-Based Fees and Side-By-Side Management.....	7
Item 7: Types of Clients.....	7
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	8
A. Methods of Analysis and Investment Strategies .....	8
B. Material Risks Involved.....	8
C. Risks of Specific Securities Utilized .....	9
Item 9: Disciplinary Information.....	11
A. Criminal or Civil Actions.....	11
B. Administrative Proceedings.....	11
C. Self-regulatory Organization (SRO) Proceedings.....	11
Item 10: Other Financial Industry Activities and Affiliations .....	11
A. Registration as a Broker/Dealer or Broker/Dealer Representative .....	11
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	11
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests .....	12
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections.....	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
A. Code of Ethics .....	12
B. Recommendations Involving Material Financial Interests .....	13
C. Investing Personal Money in the Same Securities as Clients .....	13
D. Trading Securities At/ Around the Same Time as Clients' Securities .....	13

Item 12: Brokerage Practices.....	13
A. Factors Used to Select Custodians and/or Broker/Dealers.....	13
1. <i>Research and Other Soft-Dollar Benefits</i> .....	14
2. <i>Brokerage/Custodian for Client Referrals</i> .....	14
3. <i>Clients Directing Which Broker/Dealer/Custodian to Use</i> .....	14
B. Aggregating (Block) Trading for Multiple Client Accounts.....	14
Item 13: Review of Accounts.....	15
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	15
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	15
C. Content and Frequency of Regular Reports Provided to Clients.....	15
Item 14: Client Referrals and Other Compensation.....	16
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	16
B. Compensation to Non – Advisory Personnel for Client Referrals.....	16
Item 15: Custody.....	17
Item 16: Investment Discretion.....	17
Item 17: Voting Client Securities (Proxy Voting).....	17
Item 18: Financial Information.....	17
A. Balance Sheet.....	17
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	18
C. Bankruptcy Petitions in Previous Ten Years.....	18
Item 19: Requirements for State Registered Advisers.....	18
A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background.....	18
B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any).....	18
C. Calculation of Performance-Based Fees and Degree of Risk to Clients.....	18
D. Material Disciplinary Disclosures for Management Persons of this Firm.....	18

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Imber Financial Group, LLC (hereinafter "IFG") is a Limited Liability Company organized in the State of Michigan. The firm was formed in June 2009, and the principal owners were Imber Family Living Trust and Jimber Family Trust. In 2021 Jimber Family Trust purchased IFG from Imber Family Living Trust and is the sole owner of the Adviser. The Jimber Family Trust is wholly owned by Jonathan Imber.

### B. Types of Advisory Services

#### Portfolio Management Services

IFG offers ongoing portfolio management services to individual clients through the platform(s) offered by third party institutional service providers and sponsored plan participants through their employer's sponsored plan.

Our portfolio management services will be based on the individual goals, objectives, time horizon, and risk tolerance of each client. IFG creates an Investment Policy Statement for each client, which outlines the client's current situation. Portfolio management services include, but are not limited to, the following:

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

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

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

IFG may direct clients to outside money managers to manage all or a portion of the client's assets. Before selecting other advisers for clients, IFG will always ensure those other advisers are properly licensed or registered as an investment adviser. IFG conducts due diligence on any outside money manager, which may involve one or more of the following: phone calls, meetings and review of the outside money manager's performance and investment strategy. IFG then makes investments with an outside money manager by referring the client to the outside money manager. IFG will review the ongoing performance of the outside money manager as a portion of the client's portfolio.

### **Individual Client Asset Management**

Individual accounts will be managed by Imber Financial Group through a platform provided by AE Wealth Management or AssetMark. These platforms provide us access to different strategies and products. Based on the client's objectives and tolerance to risk, we will select a strategy or strategies and choose the products in which the client's assets will be invested. Accounts will be monitored and reviewed on a regular basis and reallocations made when deemed in the client's best interest.

### **Sponsored Plan Participant Asset Management**

Sponsored plan participant accounts will be managed by Imber Financial Group through the employer's sponsored plan. We will invest the client's assets based on the available products, the client's objectives and their tolerance for risk. Accounts will be monitored and reviewed on a regular basis and reallocations made when deemed in the client's best interest.

### **Sub-Advisers**

IFG, in providing the services agreed upon with the client, may retain hereafter ("the Sub-Adviser"), an investment adviser registered under applicable securities laws, as a Sub-Adviser to manage all or a portion of the managed assets in the Client's account. If this occurs, IFG will be responsible for the continuing supervision of the Client's account, and the actions of the Sub-Adviser in connection with the Client's account and the managed assets. IFG also will be responsible for the payment of any advisory fee or other charges of the Sub-Adviser with respect to the managed assets unless or except as specifically authorized in advance by the Client. IFG agrees that upon proper notice by the Client, IFG will refrain from the appointment of, or terminate as permitted under applicable contracts, any Sub-Adviser appointed pursuant to this authority.

### **Outside Money Managers**

In some instances, IFG will determine that it is in the client's best interest to utilize the services of an outside money manager. When we recommend the use of an outside money manager, we will direct clients to outside money managers in which IFG has entered into an agreement. These outside money managers will manage the assets of the clients' portfolios on behalf of IFG. IFG will ensure that any outside money manager in which IFG has an agreement is properly registered with either the SEC or each state under whose jurisdiction the outside money manager conducts business.

The outside money manager managing client's assets on IFG's behalf will manage the portfolios and have full discretion to manage the portfolios in accordance with their

specific investment philosophy and process, within the Client's guidelines.

The outside money manager has the discretion to determine the securities to buy and sell within the account, subject to any reasonable restrictions imposed by the Client. IFG shall provide its ADV as well as the outside money manager's ADV upon hire and any material revisions to IFG or the outside money manager's ADV.

Accounts are typically managed in accordance with each outside money manager's overall investment style focused on an investment philosophy. IFG and each outside money manager comply with all standards of fiduciary responsibility as required by ERISA in managing Client accounts.

### ***Financial Planning***

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

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

IFG offers the same suite of services to all its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent IFG from properly servicing the client account, or if the restrictions would require IFG to deviate from its standard suite of services, IFG reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. IFG is not the sponsor of or manager to any wrap fee programs.

### **E. Assets Under Management**

IFG has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$70,575,660	\$0	December 31, 2024

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

##### **Asset Management Fee**

IFG charges an asset-based fee of .5% to 1.5% annually, based on the complexity of the client's financial circumstances and needs. The advisory fee is billed monthly in arrears for funds held with AE Wealth Management and calculated using the average daily balance. For certain other clients, the advisory fee is billed quarterly in advance and calculated using the value of the assets in the Account(s) on the last business day of the prior billing period.

The fees described above are annual fees and may be negotiable based at IFG's discretion. Clients may terminate the agreement without penalty for a full refund of IFG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

##### **Outside Money Manager Fees**

Imber Financial Group may utilize outside money manager(s) which would incur an additional fee. Imber Financial Group will be compensated by the advisory fees collected from the client. Fee charged by outside money manager(s) is based upon the amount of money invested and can range from 0-1%. Fees will be charged based on the schedule dictated by the outside money manager. Please refer to the ADV Part 2 of the outside money manager(s) for a full description of fees

Other fees for special services may also be charged. The Client should consider all applicable fees.

The fee the Client pays will be outlined within the Investment Advisory Agreement.

##### **Sponsored Plan Participant Asset Management Fee**

Imber Financial Group does not impose a minimum account balance for the opening of an account with the Adviser. The fee charged is based upon the amount of money invested. The fee for providing asset management services to a sponsored plan participant is going to be 1.00% annually. Fees are charged quarterly in advance. Payments are due and will be assessed quarterly based on the last business day of the prior billing period of the account(s) under management. The Adviser will pro rate for deposits and withdrawals in the account during the billing period.

#### *Financial Planning Fees*

The negotiated fixed rate for creating client financial plans is between \$500 and \$15,000.



*All above fees are negotiable at the Adviser's discretion.*

## **B. Payment of Fees**

### *Payment of Portfolio Management Fees*

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

Any IFG account, excluding retirement plans, is billed by a third-party. Clients do not incur any additional charge for this administrative fee as it is part of our management fee.

### *Outside Money Manager Fees*

Outside money managers fees are withdrawn directly from the client's accounts with client's written authorization. will be charged and paid according to each outside money manager's fee schedule. Please refer to each outside money manager's ADV Part 2A and agreement for a full description of their fees.

### *Payment of Financial Planning Fees*

Financial planning fees are paid via check.

Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

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

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

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

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

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

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

Neither IFG nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

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

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

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Charitable Organizations

There is no account minimum for any of IFG's services.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

IFG's methods of analysis include Fundamental analysis and Modern portfolio theory.

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

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

#### *Investment Strategies*

IFG uses long term trading and short-term trading.

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

### B. Material Risks Involved

#### *Methods of Analysis*

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

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

#### *Investment Strategies*

**Long term trading** is designed to capture market rates of both return and risk. Due to its

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

**Selection of Other Advisers:** Although IFG will seek to select only money managers who will invest clients' assets with the highest level of integrity, IFG's selection process cannot ensure that money managers will perform as desired and IFG will have no control over the day-to-day operations of any of its selected money managers. IFG would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

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

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

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

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

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

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

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and

credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

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

**Real estate funds** (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

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

### ***AssetMark***

Investing in securities involves risk of loss that clients should be prepared to bear.

In advising retail clients of IFG investing in AssetMark Platform, IFG may select from mutual funds, Exchange Traded Funds (ETF's), and other investment solutions offered on the Platform. These solutions are provided by a number of institutional investment

strategists and based on the information, research, asset allocation methodology and investment strategies of these institutional strategists, including AssetMark.

IFG also introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios using a variety of different securities analysis methods, sources of information and investment strategies. Clients will receive a separate disclosure brochure from these investment managers regarding their investment advisory services.

With respect to clients investing in the AssetMark Platform, IFG introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios including a wide variety of security types. Clients will receive a separate disclosure from such investment managers regarding any such investment manager's advisory services.

## **Item 9: Disciplinary Information**

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

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

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

There are no self-regulatory organization proceedings to report.

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

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

Neither IFG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

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

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

Investment Advisor Representative of IFG are independent licensed insurance agents, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. IFG always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of IFG in connection with such individual's activities outside of IFG.

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

IFG may direct clients to outside money managers to manage all or a portion of the client's assets. IFG will be compensated via a fee split from the advisers to which it directs those clients. This relationship will be memorialized in each contract between IFG and each outside money manager. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that IFG has an incentive to direct clients to the outside money managers that provide IFG with a larger fee split. IFG will always act in the best interests of the client, including when determining which outside money manager to recommend to clients. IFG will ensure that all recommended advisers are licensed, or notice filed in the states in which IFG is recommending them to clients.

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

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

IFG has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual

Review, and Sanctions. IFG's Code of Ethics is available free upon request to any client or prospective client.

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

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

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

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

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

From time to time, representatives of IFG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of IFG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, IFG will never engage in trading that operates to the client's disadvantage if representatives of IFG buy or sell securities at or around the same time as clients. Adviser will not front run its trades ahead of clients when buying or selling securities for themselves at or around the same time as clients.

## **Item 12: Brokerage Practices**

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

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



premium or commission on transactions, beyond the actual cost imposed by the broker dealer/custodian.

IFG will generally require clients to use Fidelity Brokerage Services LLC, or Schwab Institutional, a division of Schwab, Inc. Member FINRA/SIPC. In certain circumstances we will allow a client to direct IFG to use another custodian.

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

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

### ***2. Brokerage/Custodian for Client Referrals***

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

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

IFG will generally require clients to use a specific broker-dealer/custodian to execute transactions. In certain circumstances we will allow a client to direct IFG to use another custodian. Not all advisers require clients to use a particular broker-dealer.

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

If IFG buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, IFG would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. IFG would determine the appropriate

number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

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

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

All client accounts, for IFG's advisory services provided on an ongoing basis, are reviewed at least Annually by an Investment Advisor Representative of IFG with regard to clients' respective investment policies and risk tolerance levels.

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

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

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

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

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

Each client of IFG's advisory services provided on an ongoing basis will receive a quarterly statement detailing the client's account, including assets held, asset value, and calculation of fees. This written statement will come from the custodian.

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

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

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

IFG may also receive compensation from the selected third-party advisers via a fee split.

IFG participates in the institutional advisor program (the “Program”) offered by Schwab. Schwab offers independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. IFG receives some benefits from Schwab through its participation in the Program.

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

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

IFG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, IFG will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Advisor does not maintain custody of client funds or securities.

## **Item 16: Investment Discretion**

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

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

The Adviser has no authority to vote proxies for select, existing clients that meet specific circumstances.

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

### ***AssetMark***

The Client retains the right to vote proxies if the Account is invested in a Mutual Fund, ETF or Variable Annuity Investment Solution. If the Account is invested in an IMA, CMA, or UMA Investment Solution, the Client designates the applicable Discretionary Manager as their agent to vote proxies on securities in the Account. Client acknowledges that as a result of this voting designation they are also designating the Discretionary Manager as their agent to receive proxies, proxy solicitation materials, annual reports provided in connection with proxy solicitations and other materials provided in connection with the above actions relating to the assets in the Account. However, the Client retains the right to vote proxies and may do so by notifying IFG in writing of the desire to vote future proxies.

## **Item 18: Financial Information**

### **A. Balance Sheet**

IFG neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

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

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

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

## **Item 19: Requirements for State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

The education and business backgrounds of Investment Advisor Representatives of Imber Financial Group can be found on the Form ADV 2B brochure supplements for those individuals.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### **C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

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

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.