

In those instances where AIC is both the broker-dealer of record on said products and simultaneously acts as the Registered Investment Adviser, any such fees paid to AIC will be retained by AIC solely in its capacity as broker-dealer. To avoid conflicts of interest and to eliminate incentives for recommending products paying such fees, however, AIC will not pay out any portion of said fees to its advisory affiliates. Moreover, AIC does not maintain any preferred product lists or recommended product strategies designed to steer advisory affiliates toward any particular product(s) or higher cost share classes. Nonetheless, clients should not necessarily assume that they will be invested in the lowest cost share class.

In those instances where AIC acts as the Registered Investment Adviser but is not the broker-dealer of record, any such fees paid by certain mutual funds, variable insurance products or other investment vehicle sponsors will not be paid to, received by, or retained by AIC.

Clients may be able to obtain lower fees for similar services from different AIC Affiliates and/or other Registered Investment Advisers.

Fees charged to clients may be lower than the aforementioned maximum fees depending on the nature of any pre-existing relationship, the complexity of the accounts, or terms and conditions of any outstanding or pre-existing verbal or written agreement to which AIC is a party.

Item 6. Performance-Based Fees and Side-By-Side Management

Under its advisory agreements, AIC and its Affiliates will not charge performance fees on assets that it manages. They may, however, share in performance fees charged by other advisors to whom it refers clients or with whom it acts as a co-advisor. Performance fees may only be charged to “qualified” investors under Rule 205-3 of the Investment Advisers Act, generally persons who have a net worth of at least \$2 million. Performance fees give an advisor an incentive to recommend more aggressive investments than otherwise would be the case in order to maximize gains and thereby its fees, thereby adding another conflict of interest beyond those that accompany other forms of compensation to an advisor.

Item 7. Types of Clients

AIC provides investment advisory and financial planning services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and corporations.

Requirement for Opening Accounts (Minimum Investment Amount)

AIC’s fees for each particular service are subject to negotiation and could vary depending upon circumstances, including the scope of the services to be provided. AIC does not impose a minimum account size or minimum fees as a requirement for opening and/or maintaining an account. However, third-party managers may require account minimums as described in their disclosure documents.

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

Methods of Analysis

Some Affiliates may utilize charting, fundamental, technical, and cyclical analysis; however, the primary method of analysis used by Affiliates is to evaluate the client’s investments to determine whether they correspond with his or her financial objectives.

Third-party managers may employ a number of techniques and a variety of analyses, both proprietary and non-proprietary, to guide them in their investment selection process. The Form ADV of the third-party manager will provide full details on their selection process.