

AIC performs due diligence on a variety of investment offerings including direct participation programs and insurance products. Only those investments that meet minimum requirements of high standards will be on the “approved product list” and be offered for sale to clients by our Reps.

For supervised or managed accounts, our Affiliates may recommend, and our clients may choose to implement supervised or managed account strategies through our clearing broker, National Financial Services, LLC (NFS). On NFS’ advisory platform, Affiliates may use load-waived funds, no-load funds and other securities. Advisory clients will pay ticket charges for load-waived funds, no-load funds and other securities. NFS provide clients with account statements.

Additionally, our Affiliates may recommend, and our clients may choose to implement supervised or managed account strategies through a discount broker or custodian. The selection is made based on the discount rates and execution services available to the client. Clients may pay transactions fees or ticket charges to these brokers or custodians for the purchase of no-load funds and other securities. These firms provide clients with account statements. We are not registered representatives of these outside brokers or custodians, and do not receive any commissions or fees from recommending these services.

Aggregation of Client Orders

AIC may aggregate trades and execute block trades. AIC has no specific policy regarding the aggregation of trades and thus, in instances where trades could possibly be aggregated but are not, execution costs may be higher. Regardless of whether trades are aggregated or not, individual investment advice and treatment will be accorded to each advisory client consistent with client's investment objectives. No Advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The aggregation should, on average, reduce the cost of execution, and AIC and/or its Affiliates will not aggregate clients’ orders if in a particular instance we believe that aggregation would cause clients’ cost of execution to be increased. AIC and/or its Affiliates may participate in block trades with clients and may also participate on a pro rata basis for partial fills, but only if clients receive fair and equitable treatment.

Item 13. Review of Accounts

Review of Accounts

Generally, a client retaining service for financial plans would not receive any scheduled reviews or on-going reports, unless AIC or its Affiliates are specifically retained for these services by the client. Generally, managed or supervised portfolios are reviewed periodically.

Each Affiliate does the direct review of his/her client accounts; the frequency of review and extent of review is determined upon acceptance of the Agreement and is based upon the engagement of services. An AIC supervisor conducts periodic reviews of client activity.

Overall investment management, market prospects and individual issue prospects may be considered in the review process. Triggering factors that may affect an account review could be any material change in a client’s account such as a change in company earnings, industry/company outlook as well as other economic factors. All clients are encouraged to conduct an annual review of their financial objectives, account performance as well other relevant factors.

Nature and Frequency of Reports

Clients receive standard account statements from investment sponsors, custodians and/or brokerage firms.

Clients receive reports on accounts, conveyed either in writing or orally, and on a frequency agreed upon by the client and AIC and/or Affiliate, but no less than annually.