AMI INVESTMENT MANAGEMENT, INC.

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260-347-1281
www.amiinvestment.com

March 26, 2021

Form ADV Part 2

This brochure provides information about the qualifications and business practices of AMI Investment Management (AMI). If you have questions about the content of this brochure, please contact us at 260-347-1281 and/or info@amiinvestment.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 AMI is also available on the SEC's website at: www.adviserinfo.sec.gov.

AMI is a registered investment advisor. Registration of an investment advisor does not imply any certain level of skill or training. The oral and written communications of an advisor provide you with information which you may use to determine to hire or retain an advisor.

ITEM 1 – COVER PAGE

ITEM 2 – MATERIAL CHANGES

There are material changes in Item 8 pertaining to Investment Risk.

ITEM 3 – TABLE OF CONTENTS

ITEM 4 – ADVISORY BUSINESS

Founded in 1995 by Michael D. Axel, CFA, AMI provides independent investment management services to individuals and institutions. AMI is a registered investment advisor (RIA) fully owned by management (Mr. Axel). AMI focuses on providing investment management services primarily for long-term investors. Our goal is to protect and enhance the purchasing power of our clients' assets and our guiding principle is to treat clients the way we would want to be treated if our roles were reversed. We aim to avoid conflicts of interest between us and our clients, operate with full transparency, carry on a high-quality and meaningful dialogue with our clients, adhere to sound long-term investing principles and rely on our bottom-up fundamental research when constructing investment portfolios.

AMI focuses on the management of our clients' investment assets. We work with our clients to develop an investment policy statement (IPS) that meets their long-term goals and objectives. The IPS typically sets forward limits on what percentage of the client's portfolio can be invested in a given asset class (e.g. stocks or bonds). The IPS is crafted to meet both the client's *ability* and *willingness* to accept investment risk. AMI generally has discretionary authority over our clients' investments, meaning that we are able to make decisions regarding the purchase or sale of investment securities without obtaining the consent of the client. Clients are generally free to impose restrictions on investing in certain securities or types of securities, although the majority impose no such restrictions outside of the standard language set forth in the IPS.

AMI invests across a broad range of securities, including but not limited to domestic and international stocks, corporate and sovereign bonds, real estate investment trusts, exchange-traded funds and mutual funds. AMI invests in alternative investments if given authority by the client. For qualifying clients, this could include private investment structures such as limited partnerships (such investments require specific client approval). We do not limit ourselves to providing advice to any specific set of investments or investment classes. More information on our investment strategies can be found in Item 8.

As of December 31, 2020, AMI managed $648,198,928 million in assets. AMI does not participate in any wrap fee programs.

AMI also offers financial planning services for our clients. Such services may include investment planning, retirement planning, educational planning, estate planning, cash flow planning, business planning and other areas of analysis. Clients are responsible for the implementation of any plan recommendations, which may or may not be offered in writing.

ITEM 5 – FEES AND COMPENSATION

The annual fee charged to a client is computed as a percentage of the value of the assets under management on the last day of the preceding quarter. Such fees are payable quarterly in advance, and are deducted from the client's account unless the client requests to be billed directly. AMI's fee schedule is as follows:

<u>Equity/Balanced Accounts</u>

1.0% of the first $ 2.5 million
.80% of the next $ 2.5 million
.60% of the next $ 5 million
.40% of the balance

Prorated fees are charged at the inception of a signed investment advisory agreement. Fees are refunded, at a prorated rate, to the date of termination if the client terminates their relationship with AMI. Clients pay all additional expenses related to an account, including custodian fees, brokerage charges and commissions and taxes. AMI regards its fees as non-negotiable, though we retain the right to make exceptions to this policy. AMI generally does not charge for any other services associated with the management of the client's account, such as retirement planning.

Certain assets under management may be invested in mutual funds or similar investment structures. Mutual fund companies pay advisory fees to their fund managers. The impact of this management fee is the reduction of the funds' net asset value. Therefore, clients pay two levels of advisory fees for assets invested in mutual funds, one directly to AMI and one indirectly to the managers of the mutual funds held in their portfolio.

AMI does not share in any of the mutual fund's compensation and is focused on the performance of the fund net of any fund manager fees. AMI does not accept compensation for the sale of securities or any other investment product. Though AMI may make exceptions, we intend to utilize no-load or load-waived funds exclusively.

AMI will use any broker dealer at the request of a client. However, AMI may suggest brokers to clients. For more information on AMI's brokerage relationships, please see Item 12.

AMI generally does not charge any extra fees for financial planning services and instead includes the services as part of the core investment advisory relationship. In select cases, AMI may charge a fixed retainer for services rendered. Such fees are based on the complexity of the services required, but generally do not exceed $5,000, although AMI is not restricted from charging fees in excess of this for highly complex cases. The agreed upon fee for financial planning services will be billed quarterly to the client at the end of each quarter.

ITEM 6 – PERFORMANCE-BASED FEES

AMI does not charge any performance-based fees.

ITEM 7 – TYPES OF CLIENTS

AMI provides services to a variety of types of investment clients, including the following:

- Individuals (other than high net worth individuals and includes trusts, estates, IRAs and 401(k) plans)
- High net worth individuals (includes trusts, estates, IRAs and 401(k) plans)

- Pension and profit sharing plans
- Charitable organizations and non-profits
- Corporations

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

AMI divides its research efforts into three different buckets: fixed income, equities (stocks), and external managers. In each case, AMI relies on bottom-up research as opposed to top-down decision making, meaning that our investment activity is driven by our fundamental research on the underlying investment security, not macroeconomic considerations. We are generally value investors, meaning that we attempt to buy investments at a discount to our estimate of intrinsic value. The main sources of information that we use include, but are not limited to: interviews with company management, annual reports, prospectuses, filings with the Securities and Exchange Commission, company press releases, financial newspapers, financial magazines, inspection of corporate activities and research materials prepared by others. Although our research across the buckets listed above is largely similar, clients may find it useful to consider the following investment parameters that we hope to meet when purchasing a given investment:

Fixed income: AMI tries to construct broadly diversified fixed income portfolios that provide income and safety. Our fixed income portfolios carry investment-grade ratings and we generally avoid taking outsized credit risk. This does not preclude the possibility of loss, however, and we may choose to take on more credit risk if we believe the potential reward outweighs our estimation of the risks. Based upon our views of interest rates, we may adjust the duration of the portfolio (the sensitivity of the portfolio to interest rates). When selecting individual bonds, we consider the investment quality of the borrower, the duration of the security and the fit with the overall portfolio.

Equities: AMI looks to purchase stocks in companies that (a) have understandable long-term economics, (b) are not subject to outsized financial or operational risks, (c) have an aligned and trustworthy management team and (d) are priced at a discount to a conservative estimate of intrinsic value. AMI relies on fundamental research to make these determinations and our research does not preclude the possibility of loss. We generally try to focus on our best ideas and companies that we know well, resulting in a portfolio of 10-30 stocks. We typically invest in domestic securities.

External managers: This typically refers to mutual fund managers, although it may also include other forms of investment vehicles. AMI uses external managers for asset classes outside of core stocks and bonds, such as international stocks or emerging market bonds, and for core stocks and bonds in cases where the client utilizes AMI's Advisor Services or AMI believes that the inclusion of the given manager would be beneficial to the investment portfolio. AMI approaches manager due diligence with the same framework of in-depth research as we do our bond or stock portfolios. AMI tries to partner with managers that display the following characteristics: (a) an aligned incentive structure, including reasonable fees and meaningful co-investment, (b) focus on a specific investment class or niche where the manager has a sustainable investment edge, and (c) a commitment to value-investing principles and fundamental research. AMI's goal is to locate a handful of investment partners that we can build long-term relationships with. However, AMI has no affiliations with external managers and we are free to change relationships at any time. AMI's manager due diligence process does not preclude the possibility of loss.

Each client's account, subject to their IPS, is managed according to a strategic policy portfolio. This means that given the risk tolerance of the investor as defined by their allowable asset allocation ranges in their IPS, the portfolio is targeted to a specific stock/bond mix, such as 60% in stocks and 40% in bonds. Cash and alternative investments are incorporated into this policy portfolio based upon our estimate of their underlying risk. We believe that it is usually difficult to add value by deviating from these policy weights. However, in certain cases, where AMI believes that a given asset class is significantly mispriced such that its risk-adjusted return potential is materially different from both historical experience and competing asset classes, we will choose to deviate from the strategic asset allocation targets. For instance, if we believe that stocks, as a whole, are priced well in excess of what we think they are worth, we may underweight equities. We would likely only do this if (a) we were unable to find individual stocks that we thought were worthy of purchase, (b) we thought the market was clearly overvalued based upon fundamental valuation metrics and (c) investor psychology supported the notion of a speculative investment bubble. Such actions have been historically rare and any such actions in the future may be unsuccessful.

AMI considers itself a long-term investor, generally planning to hold investments for several years. Though there are occasionally exceptions, we believe that investment strategies with high turnover rates and investment theses based on short-term expectations are largely ineffective, due both to heightened costs from frequent activity and inattention to the long-term factors that we believe drive successful investments. This does not preclude AMI from making short-term investments.

Clients should be aware that AMI's investment approach is not guaranteed to be effective, that past results are not indicative of future results and that investments in securities may result in capital gain or loss. Clients should be comfortable with the asset allocation ranges outlined in their IPS.

The following risks may be relevant depending upon the specific holdings within a client's account.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools:
Investments in pooled investments are generally less risky than investing in individual securities. However, these pooled investments are still subject to risks associated with the markets in which they invest. In addition, a pooled investment fund's success will be related to the skills of their particular managers and their performance in managing their funds. Diversification risk can also be increased if the fund concentrates in a particular sector of the market, invest primarily in speculative or small cap companies, or uses leverage to a significant degree. Pooled investment funds are also subject to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940. Finally, ETFs differ from mutual funds since they can be bought and sold throughout the day and their price can fluctuate throughout the day.

Equity Market Risks:
Equity investments (primarily stocks) are subject to individual company performance that could cause loss of principal, but also to possible valuation declines due to general market declines over a period of time (often called bear markets), regardless of individual companies prospects. Equity prices may also be effected by other factors, such as the class of stock (common or preferred, etc.), or general economic health, particularly in the area that the company primarily operates within.

Fixed Income Risks:
While investing in fixed income instruments (either directly or through pooled investments) is generally considered less volatile than investing in equities, they are subject to risk. Some of these include interest rate risk, currency risk, credit risks (risks of default by borrowers) or maturity risk (risk that the bond will change value from the time of issuance to maturity). Bond maturities of ten years or greater may have material price swings when interest rates change. The shorter the maturity the less volatile the price swings are likely to be.

Liquidity Risk:
AMI may from time to time purchase securities with reduced liquidity. If a security is illiquid, we may be unable to sell the security at our desired target date, and the security could have the effect of decreasing the overall level of a client account's liquidity. Further, the lack of an established secondary market may make it more difficult to value illiquid securities, which could vary from the amount realized upon disposition of the security. A client could lose money if it cannot sell a security at the time and price that would be most beneficial. Liquidity risk is even higher for investments in private placements, restricted securities, and certain foreign issues because they may not be publicly traded and the level of investor protection is generally lower than for publicly traded securities.

International Securities Risk:
Although we invest primarily in US based investments we may include international investments in client portfolios as a way of providing additional diversification to client accounts. When invested in foreign securities, the following Risks factors may be present. AMI attempts to take these factors into account when making international investments.

Foreign securities are subject to political, regulatory, and economic risks that may not be present in U.S. domestic investments. Foreign securities can experience more volatility than their domestic counterparts and could be affected by factors not present in the U.S., including confiscation of property or nationalization, difficulties in enforcing contracts, and other legal risks, including the possibility of limited access to legal remedies than would be afforded in the U.S. Compared to U.S. companies, there may be less publicly available information about foreign companies, and there may be less governmental regulation and supervision of foreign companies. In addition, to the extent that investments are made in a limited number of countries, events in those countries will have a more significant impact on a strategy. Finally, foreign investments may be affected favorably or unfavorably by currency risks.

The risks associated with investing in foreign securities are increased in connection with investments in securities associated with emerging markets. Countries in these markets are more likely to experience high levels of inflation, deflation or currency devaluation, which could also hurt their economies and securities markets. The risks of investing in these markets also include the risks of illiquidity, increased price volatility, less government regulation, less extensive and less frequent accounting, financial and other reporting requirements, risk of loss resulting from problems in share registration and custody, and the nationalization of foreign deposits or assets. In addition, countries in emerging markets are more likely to experience and political changes.

Pandemics
Occurrences of epidemics or pandemics, depending on their scale, may cause different degrees of damage to global, national and local economies, or extreme volatility in US or global markets due to their unique, usually rapidly changing, and hard to quantify risks. In general, epidemics or pandemics may result in varying reductions in commercial activity. Governments, on the national, local and state level, may institute a variety of measures including closing borders, lockdowns, quarantines and states of emergencies, which may lead to the disruption of supply chains, and which collectively may slow the national or global economy, leading to adverse effects in the global equity, bond, and credit markets. Such disruptions may adversely affect client returns.

ITEM 9 – DISCIPLINARY INFORMATION

AMI has not had any type of legal or disciplinary events.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

AMI is not currently involved in any other business activities nor does it have any material business affiliations.

ITEM 11 – CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our employees are required to read, sign and comply with the firm's "Code of Ethics" which explains our standards of conduct and the requirement that all employees must file quarterly and annual activity and holdings reports with our Compliance Officer. Employees must also read, sign and comply with "AMI Investment Management's Fiduciary Duty Policy" which details our policies regarding our fiduciary and other obligations. We always act in the best interest of the client which represents the guiding principle of our firm. Both forms are available upon request. AMI employees buy or sell stocks, bonds, mutual funds and/or other investments that are also recommended to clients. Stock trades are generally included in an aggregated or "block" trade where one trade covers many accounts and the execution price is the same for all accounts. The quantity is then allocated into these accounts according to the guidelines in the client's IPS. AMI employees generally hold the same investment securities as our clients and any exceptions require approval from the Compliance Officer and the President.

ITEM 12 – BROKERAGE PRACTICES

AMI does not maintain custody of clients' assets that we manage. All assets must be maintained by a broker dealer (broker). We will use any broker of the client's choice; however, this may limit or eliminate our ability to negotiate competitive commission rates and best price for trade executions. Additionally, such accounts may not be able to participate in aggregated purchase or sale orders.

AMI places aggregate or "block" orders for the same equity security held in two or more accounts in order to achieve best execution for our clients as well as a measure to ensure that all clients are treated fairly and equitably. In the event that there are partially filled orders in the execution of a block trade, AMI will allocate fills on a pro rata basis to each client participating in the trade.

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, but not limited to:

- Combination of transaction execution services and asset custody services
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests etc.)
- Breadth of available investment products (stocks bonds, mutual funds, exchange-traded funds (ETF's) etc.
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service record

AMI suggests that clients custody their assets at Schwab Institutional. All broker dealers provide AMI clients institutional rate commission schedules. Investment research supplied by brokers is used in servicing all accounts. Any broker who supplies investment research does not receive preferential treatment from AMI and must provide competitive commission schedules. AMI does not have any oral or written arrangement with any broker where it receives some economic benefit (including equipment or non-research services). AMI does not receive any referrals from the brokerage firms that it works with.

ITEM 13 – REVIEW OF ACCOUNTS

Investments are monitored on an ongoing basis with regard to fundamental value, risk, and expected return. Individual client accounts are reviewed on an ongoing basis by portfolio managers, who utilize various electronically prepared reports. Reviewing instructions include targeted asset allocations, buy/hold/sell determinations and any investment policy guidelines by the client. Clients receive from AMI, at a minimum, a quarterly report and appraisal of their portfolio's current status. Supervisory account reports include all positions held, the market value and cost of such positions, yield and percentage of assets allocated to each position, recent account activity, realized gains and losses and relevant performance information. Some clients request more frequent reports. Depending on preference, every client receives both physical or electronic trade confirmations and monthly (or quarterly if there is no activity) brokerage statements from their custodian.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

AMI does not directly or indirectly compensate anyone for referrals.

ITEM 15 – CUSTODY

Under government regulations, we are deemed to have custody of your assets, if for example, you authorize us to instruct your broker (who maintains actual custody) to deduct our management fees directly from your account or if you grant us authority to move your money to another person's account. You will receive account statements directly from your broker monthly (or quarterly if there is no activity). They will be sent to the email or postal mailing address that you provide to AMI. We urge you to compare your broker's statements to the reports that you receive from us.

ITEM 16 – INVESTMENT DISCRETION

Based on your IPS, AMI has the discretionary authority to determine, without obtaining consent, what securities are to be bought and sold, the amount of securities to be bought or sold and the broker to be used. Clients may elect to put additional restrictions on investment accounts outside of the standard language set forth in the IPS.

ITEM 17 – VOTING CLIENT SECURITIES

As of January 2016 AMI Investment Management no longer votes client proxies.

ITEM 18 – FINANCIAL INFORMATION

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

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS

We are an SEC-Registered Investment Advisor; accordingly, this item is not applicable.

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Form ADV Part 2B – Brochure Supplement

Michael D. Axel, CFA
Jacob D. Benedict, CFA
Ryan Kay, CFP®, AIF®

March 26, 2021

This brochure supplement provides information about Michael D. Axel, CFA, Jacob D. Benedict, CFA, and Ryan A. Kay, CFP®, AIF® that supplements AMI Investment Management's (AMI) brochure. You should have received a copy of that brochure. Please contact AMI at 260-347-1281 and/or info@amiinvestment.com if you did not receive AMI's brochure of if you have any questions about the contents of this supplement. Additional information about Michael D. Axel, Jacob D. Benedict and Ryan A. Kay is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 1 – COVER PAGE

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Michael D. Axel, CFA / President and Founder
Prior to founding AMI in 1995, Mr. Axel served as investment manager for the Dekko Foundation and Group Dekko International and was a member of the Dekko Foundation Board of Directors. Mr. Axel established initial investment policies for Group Dekko, the Dekko Foundation and several related accounts.

Mr. Axel graduated from Wabash College with a Bachelor of Arts degree in economics and was a member of the Dean's List for academic excellence. He received his MBA from Vanderbilt University with a concentration in finance and investments. Mr. Axel was awarded the Chartered Financial Analyst (CFA) designation in 1994 and is a member of the CFA Institute.

Mike has been active in the community and has served on the Dekko Foundation Grants Review committee, the Parkview Health Board of Directors, the Oak Farm School Board of Directors, and Trine University Ketner School of Business Advisory Board. He is married and has four children. He was born on October 11, 1966.

Jacob D. Benedict, CFA / Director of Research
Prior to joining AMI in the fall of 2008, Mr. Benedict worked for CRA International, Inc., a global economic consulting firm. At CRA, Mr. Benedict worked on business valuation projects. Jacob previously worked for the Mergers and Acquisitions division of J.P. Morgan, where he assisted in valuation and acquisition analysis.

Mr. Benedict graduated *summa cum laude* from the University of Notre Dame with a Bachelor of Arts degree in economics and mathematics. He holds a Master's Degree in Applied Mathematics from

Purdue University. He was a Lilly Scholar and is a member of the Phi Beta Kappa Society. His is an adjunct faculty member at the University of St. Francis, where he teaches a course on investment theory and practice. Jacob was awarded the Chartered Financial Analyst (CFA)* designation in 2011 and is a member of the CFA Institute. He is a member of Greater Fort Wayne Business Weekly's Forty Under 40 class of 2014. He is on the Board of Trustees for the Lincoln Collection Endowment, involved in the Notre Dame Club of Fort Wayne and sits on the Noble County Thrive Steering committee. He is married and has two children. He was born on December 18, 1984.

Ryan A. Kay, CFP®, AIF® / Financial Advisor
Prior to joining AMI in the summer of 2014, Mr. Kay worked as a financial advisor for an independent wealth management firm in Fort Wayne where he provided financial guidance to individuals and institutions. Previously, he ran his own branch office for a national broker/dealer for several years where he oversaw operations and implemented financial solutions for clients.

Mr. Kay graduated from Purdue University with a Bachelor of Science degree in management. While at Purdue he minored in international business and economics and received the Certificate in Entrepreneurship. He also received a Certificate in Financial Planning from Boston University. Ryan is active in the community and is the Past-President of the Purdue Alumni Club of Fort Wayne, a member of the John Purdue Club and is on the board of directors for the Purdue Alumni Association and the Powerhouse Youth Center. He enjoys teaching and has been an Adjunct Lecturer at Indiana University – Purdue University, Fort Wayne lecturing on topics of financial planning and investing. He is married and has three children. Ryan resides in Fort Wayne. He was born on April 1, 1986.

The Chartered Financial Analyst (CFA) Designation
The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards
The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:
• Place their clients' interests ahead of their own
• Maintain independence and objectivity
• Act with integrity
• Maintain and improve their professional competence
• Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge
The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.
To learn more about the CFA charter, visit www.cfainstitute.org.

The Certified Financial Planner (CFP) Certification
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 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 71,000 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 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 S*tandards 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.

The Accredited Investment Fiduciary (AIF®) Designation
The Accredited Investment Fiduciary (AIF) designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. The purpose of the Accredited Investment Fiduciary (AIF®) Designation is to assure that those responsible for managing or advising on investor assets have a fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility. Fi360 is accredited by the American National Standards Institute (ANSI) for the AIF® Designation, making the designation part of an elite group of accredited designations recognized by FINRA.

ITEM 3 – DISCIPLINARY INFORMATION

Mr. Axel, Mr. Benedict and Mr. Kay have not had any type of legal or disciplinary events.

ITEM 4 – OTHER BUSINESS ACTIVITIES

Mr. Axel, Mr. Benedict and Mr. Kay are not involved in any other material business activities.

ITEM 5 – ADDITIONAL COMPENSATION

Mr. Axel, Mr. Benedict and Mr. Kay do not receive any relevant additional compensation.

ITEM 6 – SUPERVISION

Mr. Benedict and Mr. Kay are supervised by Mr. Axel, President who can be reached at 260-347-1281.

ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Not applicable.