



## **Secure Retirement Financial & Insurance Services Corp.**

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### **Form ADV, Part 2A Brochure**

March 22, 2022

This brochure provides information about the qualifications and business practices of Secure Retirement Financial & Insurance Services Corp. If you have any questions about the contents of this brochure, please contact us at (925) 855-4300 or [richard@secureretire.com](mailto:richard@secureretire.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.

Secure Retirement Financial & Insurance Services Corp. is a Registered Investment Adviser. Any reference to or use of the terms “registered investment adviser” or “registered,” does not imply that Secure Retirement Financial & Insurance Services Corp. or any person associated with Secure Retirement Financial & Insurance Services Corp. has achieved a certain level of skill or training.

Additional information about SRF is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2 - MATERIAL CHANGES

Revised March 22, 2022

The purpose of this page is to inform clients of material changes to the brochure. If you are receiving this brochure for the first time, this section may not be relevant to you.

Secure Retirement Financial & Insurance Services Corp. (“SRF”) reviews and updates the brochure at least annually to confirm that it remains current. SRF has made the following material changes since the previous annual update to our brochure, dated March 24, 2021.

### **Added to Item 4**

A change in regulation requires us to provide the disclosure below, in certain circumstances.

#### Retirement Account Advice

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Securities Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. The receipt of our advisory fee for making a recommendation creates a conflict of interest under ERISA/IRC with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. For example, if we recommend that you rollover assets from one retirement account to another and we will receive increased compensation as a result of that recommendation, we have a conflict that requires us to operate under this special rule.

### **Added to Item 15**

A standing letter of authorization is established by a client with a custodian and grants an investment adviser limited power to direct that custodian to disburse, to a third party, cash and/or securities held in that client’s account(s). When clients grant us such authority, we are deemed to have custody of client assets and we follow the standards set forth by regulation to protect client assets in such situations.

### **Added to Privacy Notice**

Certain individuals of SRF are licensed as registered representatives for Crown Capital (CRD#6312), a FINRA member broker/dealer. As a broker/dealer, Crown Capital has supervision responsibilities for its licensed representatives including business activities outside of Crown Capital. As such, Crown Capital reviews, has access to, and maintains all business emails of these supervised persons, including, communication with and about clients of SRF.

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## ITEM 4 - ADVISORY BUSINESS

Secure Retirement Financial & Insurance Services (“SRF”) is a state registered investment adviser firm established in 2004 to provide investment advisory and financial planning services to individuals, pensions and profit sharing plans, trusts, estates, and charitable organizations (“clients”).

### Principal Owners

Richard R. Morey and Sherry D. Morey are the trustees of a trust which owns 100% of the SRF stock. Notwithstanding the ownership by the trust of the firm’s stock, the firm’s management and control rests solely in the hands of Grantor Richard R. Morey.

### Types of Advisory Services Offered

#### SRF Investment Advisory Services

SRF offers clients investment advisory services as covered in the Investment Advisory Agreement (“IAA”) where each client’s investment account and portfolio is managed on a regular and continuous basis. SRF may assist clients in determining, among other things, suitability, investment objectives, goals, time horizons, and risk tolerances. As part of the investment advisory services, SRF may provide personalized or corporate financial planning services as segmented (limited) financial plans, investment plans, and/or individual consultations regarding a client’s financial affairs. Financial planning is complimentary to investment advisory clients who make use of the service and a written financial plan is not delivered in every engagement. The design and implementation of a financial plan may begin with the process of gathering data regarding income, expenses, taxes, insurance coverage, retirement plans, wills, trusts, investments and/or other relevant information pertaining to a client’s overall financial situation. This information is carefully analyzed, taking into account a client’s goals and stated objectives, and a series of recommendations and/or alternative strategies will be developed.

#### SRF Referral Program

SRF may also provide investment advisory services to clients referred by independent investment advisors. SRF will enter into an agreement directly with the client to provide these services.

#### Retirement Account Advice

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Securities Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. The receipt of our advisory fee for making a recommendation creates a conflict of interest under ERISA/IRC with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. For example, if we recommend that you rollover assets from one retirement account to another and we will receive increased

compensation as a result of that recommendation, we have a conflict that requires us to operate under this special rule.

## Tailored Services and Client Imposed Restrictions

SRF will tailor its advisory services to the specific needs and objectives of each advisory client. Clients may also impose restrictions on investing in certain securities or types of securities. Restrictions are generally covered in the client's investment advisory agreement and must be made in writing.

SRF does not participate in a wrap fee program at this time.

## Assets Under Management

SRF manages client assets in discretionary accounts on a continuous and regular basis. As of 12/31/2021, the total amount of assets under our management was:

|                                 |                |
|---------------------------------|----------------|
| Discretionary Assets            | \$ 103,448,564 |
| <u>Non-Discretionary Assets</u> | <u>\$ 0</u>    |
| Total Assets                    | \$ 103,448,564 |

## ITEM 5 - FEES AND COMPENSATION

### SRF Investment Management Fees

Fees are based on a percentage of assets under management, and in no case will fees exceed 2% of assets under management. Additionally, fees are not collected more than six (6) months in advance of the services for those fees.

Fees based on assets under management are as follows:

| <u>Market Value of Portfolio</u> | <u>Annual Fee</u> |
|----------------------------------|-------------------|
| The balance of 0 - \$1,000,000   | 1.00%             |
| The balance over \$1,000,001     | 0.75%             |

Generally, fees are payable quarterly, in advance. The initial fee for a new account will be based on the opening account balance and will be pro-rated for the number of days in the quarter that the account is under SRF's management. Subsequent quarterly fees will be based on the account's market value as of the close of business on the last business day of the previous quarter for which the fee is due. SRF's fee range and billing terms for each particular service is subject to negotiation and could vary depending upon various circumstances, including the scope of the services to be provided (e.g., fees and fee ranges for existing clients may differ from those indicated). With client authorization, SRF will instruct the custodian to withdraw our advisory fee from the client's account. SRF will send an

informational copy of the invoice to the client concurrent with the instructions to the custodian showing the amount of the fee due, the value of the account on which the fee is based, and how the fee was calculated. All clients will receive brokerage statements from the custodian no less frequently than quarterly. The custodian statement will show the deduction of the advisory fee.

## SRF Referral Program

Clients that have been referred to SRF will pay a fee based on assets under management with a maximum total fee of 2.00% for portfolios up to \$1,000,000 and 1.50% for portfolios over \$1,000,000.

The sample Referral Program Fee schedule below displays the maximum fees allowed and may not include certain fees charged by the broker or custodian used. In that case, those fees will be disclosed separately to the client.

The standard fee schedule for such services is as follows, but may be negotiable in individual cases.

|                       | <u>SRF</u> | <u>RF/RF Rep*</u> | <u>Total*</u>       |
|-----------------------|------------|-------------------|---------------------|
| AUM \$0 - \$1,000,000 | .75        | .25+1.00          | 2.00% (Maximum fee) |
| AUM over \$1,000,000  | .50        | .25+0.75          | 1.50% (Maximum fee) |

\*RF/RF Rep= Referral Firm and Representative fees

Fees are billed quarterly from the client's account(s) with Charles Schwab & Co.

## Other Fees and Expenses

SRF's fees do not include custodian fees. Clients pay all brokerage commissions, margin charges, and/or other charges incurred in connection with transactions in accounts, from the assets in the account. These charges are in addition to the fees the client pays to SRF. In addition, any mutual fund shares held in a client's account may be subject to deferred sales charges, 12b-1 fees, early redemption fees, and other fund-related expenses. The fund's prospectus fully describes the fees and expenses. All fees paid to SRF for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds. Mutual funds pay advisory fees to their managers, which are indirectly charged to all holders of the mutual fund shares.

## Termination of Account

Within five (5) business days of executing the client agreement, the client may terminate the agreement in writing without fee or penalty. Such termination may be verbal with written notice to follow within the next twenty-four (24) hours. After the initial five (5) business days, clients may terminate the agreement at any time in writing; and the client will be responsible for payment of fees for the number of days services are provided by SRF prior to receipt of the written notice of termination. Fees will be prorated to the date of termination and any paid but unearned portion will be refunded to the client.

## ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Neither SRF or any of its supervised persons accepts performance-based fees and therefore does not engage in side-by-side management.

## ITEM 7 - TYPES OF CLIENTS

SRF provides investment advisory and financial planning services to individuals, pensions and profit sharing plans, trusts, estates, and charitable organizations (“clients”).

### **Requirement for Opening Accounts (Minimum Investment Amount)**

SRF does not impose requirements for opening and/or maintaining an account, such as a minimum account size or minimum fees and fee ranges. All initial investment amounts are negotiable and accepted on an individual basis at SRF’s discretion.

## ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### **Methods of Analysis**

SRF’s securities analysis methods may include fundamental analysis, technical analysis, and the use of cyclical analysis and monitoring of investment cycles and trends.

### **Investment Strategies**

SRF provides its clients with a range of investment advisory services. SRF generally offers the following specific advisory portfolios: Conservative Income Portfolio; Conservative Income and Growth Portfolio; and Conservative Growth Portfolio. Client portfolios may vary based on individual needs and client directed investments.

#### *Conservative Income Portfolio*

SRF’s Conservative Income Portfolio is designed to provide a safe, steady level of competitive retirement income. The portfolio invests primarily in fixed-income mutual funds (no load) and exchange-traded funds (ETFs). The types of securities and funds purchased may include U.S. government bonds, including Treasury Inflation-Protected Securities (TIPS), corporate and mortgage bonds, floating rate bonds, exchange-listed real estate investment trusts (REITs), and international bond funds. Up to 15% of total assets may be invested into precious metals, including gold and silver, and/or other natural resources via ETFs or other open-end mutual funds. The portfolio may also invest in energy companies and mortgage REITs focused on generating income. The portfolio’s primary benchmark is the Barclays Aggregate U.S. Bond Index. The portfolio also has a secondary benchmark of CPI (Consumer Price Index) plus 4%.

### Conservative Income and Growth Portfolio

SRF's Conservative Income & Growth portfolio is an asset allocation investment that seeks to provide both income and growth while minimizing risk. The portfolio invests primarily in exchange-traded funds and actively managed, no-load mutual funds in order to achieve broad diversification. The asset classes of the ETFs or mutual funds include both domestic and international stocks, commodities and natural resources, real estate, and both domestic and international bonds and related fixed income securities. The portfolio is actively managed, with allocations changed based upon the world economy and markets. The portfolio will never invest more than 60% of the total into stocks, commodities and natural resources, and real estate (combined) asset classes. The fixed-income portion of the portfolio will never fall below 35% but may increase, up to 100% of the portfolio, based on economic and market conditions. The portfolio's primary benchmark is Morningstar Moderate Allocation Risk.

### Conservative Growth Portfolio

SRF's Conservative Growth Portfolio is an actively managed asset allocation investment portfolio designed to provide high growth with minimal risk. The portfolio invests primarily in exchange-traded funds (ETFs) and actively managed, no-load mutual funds to achieve broad diversification. Asset classes of the ETFs and mutual funds include domestic and international stocks, commodities and natural resources, real estate investment trusts (REITs), domestic and international bonds, and related fixed-income securities. Allocation changes within the portfolio are based upon shifts in the world economy and markets, and may result in investments of up to 75% into stocks, commodities and natural resources, and real estate (combined) asset classes, with the remainder in fixed-income funds. The fixed income portion of the portfolio will never fall below 25% but, based on economic and market conditions, may increase up to 100%. The portfolio's primary benchmark is the S&P 500.

For SRF to determine the appropriate portfolio for the client, the client must provide SRF with pertinent financial and demographic information. SRF will analyze the information and recommend an appropriate strategy based on the client's needs and objectives, investment time horizon, risk tolerance and any other pertinent factors. SRF will then propose an overall strategy that includes asset allocation and investment style allocation recommendations. SRF will select a portfolio based on SRF's recommended investment strategy that corresponds to the individual client's goals and objectives.

## **Investing Involves Risk**

Prior to entering into an agreement with SRF, the client should carefully consider the following:

1. That investing in securities involves risk of loss which clients should be prepared to bear;
2. That securities markets experience varying degrees of volatility;
3. That over time the client's assets may fluctuate and at any time be worth more or less than the amount invested; and

4. That clients should only commit assets that they feel are available for investment on a long-term basis.

## **ITEM 9 - DISCIPLINARY INFORMATION**

### **Disclosure Events**

On June 19, 2020 SRF entered into a Consent Order with the Department of Business Oversight of the State of California (“DBO”), effective September 30, 2020 now called the Department of Financial Protection and Innovation (“DFPI”). The order states that SRF acted in contradiction of state rules. SRF released a client’s funds without authorization or proper consent from the account holder by taking disbursement instructions from the client’s spouse and releasing the funds to the spouse. The spouse of the client perpetrated a fraud. Upon the finding by the DBO, SRF established an Identify Theft and Client Disbursement Request policy. Further, the order states that SRF loaned money to a client in contradiction of state rules. Richard Morey made a short-term, interest-free loan to a friend who was also a client for the purchase of private offering. The order further states that SRF failed to maintain current client suitability records. SRF has established Client Suitability policies. Lastly, the order states that SRF did not establish an unearned income account on its financial records. A new employee still learning the accounting system had not entered the unearned income account on the financial records. No clients were financially harmed.

## **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **Broker/Dealer Affiliation**

Neither SRF nor any of its management persons are registered, or have an application pending to register as a broker-dealer.

Neither SRF nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

As a supervised person of SRF, Jeff Warren is also currently licensed as a securities salesperson for Crown Capital (CRD#6312), a FINRA member broker/dealer. As such, Mr. Warren may recommend securities products for a commission. This presents a conflict of interest in that Mr. Warren could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. Mr. Warren will make such recommendations when he deems them to be in the best interest of the client. The client always has the right to decide whether to purchase any recommended securities and the person through whom to make a purchase. All material conflicts of interest are disclosed regarding Mr. Warren and other IARs and/or SRF which could be reasonably expected to impair the rendering of unbiased and objective advice.

## **Insurance Products**

SRF is also licensed as an insurance agency in California selling fixed annuities and life insurance products. As such, SRF or its supervised persons may recommend, on a fully disclosed basis, the purchase of certain insurance-related products for which SRF or its supervised persons receive commissions. This presents a conflict of interest between SRF's interests and those of its advisory clients. SRF will make insurance recommendations when we deem them to be in the best interest of the client. The client always has the right to decide whether to purchase any recommended insurance and the person through whom to make a purchase.

## **Selection of Other Investment Advisers**

SRF does not recommend or select other investment advisers for its clients or receive compensation directly or indirectly from those advisers as a result of such a recommendation or selection by SRF.

## **Disclosure of Material Conflicts**

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding SRF, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## **ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code of Ethics**

SRF has adopted the following Code of Ethics:

- **Fiduciary Responsibility-** SRF and its staff shall exercise the highest standard of care in protecting and promoting the interests of its clients, and will provide a written disclosure containing any conflicts of interest that may compromise their impartiality or independence.
- **Integrity-** All professional services shall be rendered with the highest level of integrity.
- **Objectivity-** SRF and its staff shall provide advice that is objective and in the best interest of the client and seek to eliminate or mitigate conflicts of interest.
- **Competence-** SRF and its staff shall maintain the necessary knowledge and skills to provide our clients with competent advice and services.
- **Fairness-** All professional services shall be performed by SRF and its staff in a manner that is fair and reasonable to its clients.

- Confidentiality- SRF and its staff shall maintain and safeguard all confidential client information in accordance with applicable laws.
- Diligence- SRF and its staff shall ensure the accuracy and completeness of records, information, and data collected, used and managed, and will take necessary steps to correct any discrepancies.
- Regulatory Compliance- SRF and its staff shall comply fully with appropriate laws and internal regulations.

SRF will provide a copy of this Code of Ethics to any client or prospective client upon request.

## **Participation/Interest in Client Transactions**

Neither SRF nor any of its related persons recommend to clients, or buys or sells for client accounts, securities in which SRF or a related person has a material financial interest.

SRF or its related persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that SRF or any of its related persons recommend to clients.

SRF and its related persons may recommend securities to clients, or may buy or sell securities for client accounts, at or about the same time that SRF or any of its related persons buy or sell the same securities for SRF's own (or the related person's own) account. However, as a preventative measure, client transactions will be conducted and implemented before any such transaction relating to any personal accounts of any affiliated persons of SRF, except when such transactions are aggregated with client transactions as outlined in Item 12 below under aggregation of client orders. In addition to this measure, all of the aforementioned advisory representatives of SRF will act in accordance with applicable securities laws and conduct their business to ensure overall compliance with applicable securities laws.

## **ITEM 12 - BROKERAGE PRACTICES**

### **Factors Considered in Selecting Custodians for Client Transactions**

Clients open one or more custodian accounts in their own name at a qualified custodian. SRF recommends the use of Schwab Advisor Services™, a division of Charles Schwab & Co., Inc. ("Schwab"), to act as custodian and broker for the client's account. The client will enter into a separate agreement with the custodian to custody the assets. SRF also requires that clients grant it limited power of attorney to execute client transactions through Schwab. SRF is independently owned and operated, and unaffiliated with Schwab. While commission rates are an important factor in custodian selection, SRF may select custodians that charge commissions higher than those obtainable from other custodians. SRF may consider a number of factors in addition to commission rates, including, for example net price, reputation, financial strength and stability, efficiency of execution and error resolution, block trading and block position capabilities, willing to execute related or unrelated difficult transactions in the future,

on-line access to computerized data regarding client accounts, custody, record keeping or other similar services, as well as other matters involved in the receipt of general brokerage services.

## **Research and Other Soft Dollar Benefits**

Regarding research and other soft dollar benefits, SRF does not receive research (both proprietary or non-proprietary) or other products or services other than execution services from a custodian or a third party in connection with client securities transactions, including but not limited to (otherwise known as “soft dollar benefits”). However, SRF may receive from Schwab, without cost (or at a discount), support services and/or other products that benefit SRF. These services and products are not directly connected with the number or amount of client securities transactions, but are available to SRF on an unsolicited basis, at no charge to SRF, for maintaining client assets in accounts at Schwab.

Schwab makes available products and services that assist SRF in managing and administering clients’ accounts including software and other technology that:

1. provide access to client account data (such as trade confirmations and account statements);
2. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
3. provide research, pricing and other market data;
4. facilitate payment of SRF’s fees from its clients’ accounts; and
5. assist with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help SRF manage and further develop its business enterprise. These services may include:

1. compliance, legal and business consulting;
2. publications and conferences on practice management and business succession; and
3. access to employee benefits providers, human capital consultants, and insurance providers.

## **Brokerage for Client Referrals**

SRF does not receive client referrals from Schwab.

## **Directed Brokerage**

SRF does not accept direction from clients to trade through specific broker-dealers.

## **Aggregation of Client Orders**

Under certain circumstances, SRF may aggregate the purchase or sale of securities for various client accounts, as well as for accounts of SRF’s supervised persons. SRF will not favor any account over any other account. This includes accounts of SRF or any of its supervised persons. SRF supervised persons will participate on the same terms as clients. Each account in the aggregated order will participate at the

average share price for all of the transactions within the aggregated trade. All accounts will pay their individual transaction costs.

## **ITEM 13 - REVIEW OF ACCOUNTS**

Clients of SRF are managed and reviewed on a continuous basis. Overall investment management, market prospects and individual issue prospects are 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 and/or company outlook as well as general economic factors or other relevant situations that may alter a client's account. All account reviews are conducted by one of SRF's designated investment adviser professionals. We offer account reviews to clients on no less than an annual basis. Clients may choose to receive reviews in person, by telephone, or in writing. It is the client's responsibility to notify SRF of any changes in the client's circumstances and investment objectives.

As may be retained by clients, reports are individualized, thereby, the nature and frequency are determined by client need and the services offered. However, each client receives a statement from the custodian not less than quarterly that includes an accounting of all holdings and transactions in the account for the reporting period. In addition, SRF provides clients quarterly reports summarizing the client's overall account activity and investment performance.

## **ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

### **Economic Benefit from Non-Clients**

Other than the benefits disclosed in Item 12 above, SRF does not receive an economic benefit for providing investment advice or other advisory services from anyone who is not a client.

### **Compensation for Client Referrals**

From time to time, third party advisers introduce clients to SRF. If SRF accepts the referral and enters into a client relationship for which it receives advisory fees, SRF will pay the third party adviser a portion of the advisory fee for the referral. As a result, the client may be charged a higher total advisory fee due to the referral than a client who came to SRF directly.

## **ITEM 15 - CUSTODY**

SRF does not maintain physical custody of client funds and/or securities. However, we do have constructive custody where we have the client's authorization to withdraw our fees from the client's account with the custodian. SRF is also deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from a client's account to a third-party ("SLOA") and under that SLOA authorize us to designate the amount or timing of transfers with the custodian. State and Federal regulators have set forth a set of standards intended to protect client assets in such situations, which we follow. Clients will receive their monthly and/or quarterly

account statements directly from the designated qualified custodian of record and therefore should carefully review those statements for accuracy. In the event that clients also receive reports from SRF, it strongly encourages each client to compare the account statements they receive from the qualified custodian with the invoices and reports they received from SRF and notify SRF promptly of any discrepancies.

## **ITEM 16 - INVESTMENT DISCRETION**

Upon receiving written authorization from a client, SRF manages client assets on a discretionary basis. In this case, the client delegates to SRF discretionary trading authorization with respect to the purchase, exchange and sale of securities in the client's account, including actively traded equity and equity-related securities, mutual funds, and fixed-income securities.

## **ITEM 17 - VOTING CLIENT SECURITIES**

SRF is typically given the authority to vote client proxies and therefore may be required to take action or render advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which assets of the clients account(s) may be invested from time to time. When SRF accepts such responsibility, we will cast proxy votes in a manner consistent with the best interest of clients. Clients generally cannot direct SRF's vote in particular solicitations. If SRF identifies a conflict of interest in connection with a particular voting decision, it will disclose the conflict to the client or contact a third party to advise SRF to determine the vote and/or provide voting recommendations. Clients may contact SRF directly at (925) 855-4300 to request information about how it voted proxies for their securities.

## **ITEM 18 - FINANCIAL INFORMATION**

### **Pre-Payment of Fees**

SRF does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

### **Material Impact of Discretionary Authority**

SRF may exercise discretionary authority over certain client funds or securities. However, SRF does not anticipate any financial condition that may be reasonably likely to impair its ability to meet contractual commitments to clients at this time.

### **Custody Disclosure**

SRF does not have physical custody of client funds or securities. Please see Custody section above for further details.

## Bankruptcy Disclosure

SRF has not been the subject of a bankruptcy petition at any time during the past ten years.

## ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

### Executive Officers and Management Persons

The following is a list of all principal executive officers and management persons, to include their formal education and business background information:

Name: Richard R. Morey

Date of Birth: 1958

Education: University of Iowa; M.A. Education (1985)

University of Iowa; B.A. General Studies (1981)

Background: Secure Retirement Financial & Insurance Services; President (01/04- Present)

Bellingham Investment Management; Financial Advisor & Marketing (06/99- 07/04)

Lighthouse Asset Management; Financial Advisor (08/96-06/99)

Easter Seal Society; Chief of Operations (08/94-08/96)

All advisory fees and how these fees will be calculated are previously disclosed above.

All material facts involving disclosure events for management persons are previously disclosed above.

All relationships or arrangements involving management persons are previously disclosed above.

## Privacy Policy

### Privacy Policy Notice

Your privacy is important to us. Your personal information is kept secure. Under federal and state law, you have a right to know what information is being collected about you and how that information will be used. SRF collects nonpublic personal information about you from the following sources:

- Information SRF receives from you on applications or other forms.
- Information about your transactions with SRF; and
- Information that you specifically have had your other professional advisors forward to SRF.

SRF does not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as directed by you:

- Under law, the information SRF collects is provided to companies that perform support services on our behalf as necessary to effect, administer, or process a transaction, or for maintaining and servicing your account;
- Certain individuals of SRF are licensed as registered representatives for Crown Capital (CRD#6312), a FINRA member broker/dealer. As a broker/dealer, Crown Capital has supervision responsibilities for its licensed representatives including business activities outside of Crown Capital. As such, Crown Capital reviews, has access to, and maintains all business emails of these supervised persons, including, communication with and about clients of SRF;
- As directed by you, SRF will be working with your other professional advisors and SRF will provide information in our possession that is reasonably requested by the other advisors.

SRF does not give or sell information about you or your accounts to any other company, individual or group, except as permitted or required by law. SRF restricts access to nonpublic personal information about you to those employees who need to know that information to provide services to you. SRF maintains physical, administrative, and technical procedural safeguards to protect your nonpublic personal information. You do not need to call or do anything as a result of this notice. It is meant to inform you of how SRF safeguards your nonpublic personal information.