

Next Generation Investing, LLC

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This brochure provides information about the qualifications and business practices of Next Generation Investing, LLC. If you have any questions about the contents of this brochure, please contact us at: 785-228-0222, or by email at: Info@RetireTopeka.com. The information in this brochure has not been approved or verified by any state or federal securities authority. This firm is registered with the Securities and Exchange Commission (SEC); registration does not mean approval or verification by those regulators and it does not imply a certain level of skill or training. More information about the firm is available on the SEC's website at www.adviserinfo.sec.gov.

Effective Date: 7/25/2023

Annual Update / Material Changes

The material changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure. There have been no material changes since our last update.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 785-228-0222 or by email at: Info@RetireTopeka.com

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Advisory Business

Firm Description

Next Generation Investing, LLC, herein referred to (“NGI”) is a limited liability company founded and formed in 2008 under the laws of Kansas and is registered with the SEC. Roger Shumaker is a 60% owner in the company and Ryan Shumaker is a 40% owner.

Types of Advisory Services

NGI provides financial planning services and portfolio management for individuals, small businesses, charities, private foundations, endowments, businesses and institutional clients and act as model managers to separately managed accounts whose use can be licensed to other Registered Investment Advisors.

Financial Planning Services

NGI engages in financial planning services for a fee. Financial planning and consulting will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of their individual needs. An Investment Advisory Representative of NGI will first conduct an initial consultation. After the initial consultation, if the client decides to engage NGI for financial planning services an Investment Adviser Representative will conduct follow up meetings as necessary, during which pertinent information about the client’s financial circumstances and objectives is collected. Once such information has been reviewed and analyzed, a financial plan – designed to achieve the client’s stated financial goals and objectives – may be presented to the client.

Clients may act on the Firm’s recommendations by placing securities transactions with any brokerage firm the client chooses. The client is under no obligation to act on the Firm’s financial planning recommendations. Moreover, if the client elects to act on any of the recommendations, the client is under no obligation to implement the financial plan through NGI or any of its Investment Advisor Representatives. Financial plans are based on the client’s financial situation at the time the plan is presented and on financial information disclosed by the client to NGI. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and use past trends and performance of markets and the economy. Past performance is in no way an indication of future performance and NGI cannot offer any guarantees or promises that the client’s financial goals and objectives will be met. As the client’s financial situation, goals, objectives, or needs change, the client must notify NGI promptly.

Financial planning services provided in a written plan include, but are not limited to; a beneficiary checkup on accounts (retirement accounts, investment accounts, life insurance, etc.), evaluation of a client’s risk tolerance, a review of a client’s current investments (including 401k’s and IRA’s) with a breakdown of their current allocation vs. the recommended allocation based on responses from a client’s risk tolerance answers, income needs, etc., an assessment of life and health insurance, a review of a client’s tax situation and possible tax minimizations strategies that could be implemented based on the advice of a qualified tax professional, estate plan review and preparation for the potential

implementation under the guidance of a qualified attorney, income needs assessment and planning, and charitable giving optimization, among other things.

Financial planning may be the only service provided to the client and does not require that the client use or purchase the investment advisory service offered by the associated persons of the Advisor. There is an inherent conflict of interest for the Advisor whenever a financial plan recommends use of professional investment management or the purchase of insurance products or other financial products or services that pay a commission. The Advisor, or its associated persons, may receive compensation for financial planning and the provision of investment management service and/or the sale of insurance and other products and services. Some advice for which a client paid a fee for may require the use of a broker/dealer in order to implement. If the client wants the applicant to implement such advice, World Equity Group, Inc. will be recommended to them. When placing securities transactions through it, they earn normal and customary sales commissions. The Advisor does not make any representation that any of these products or services are offered at the lowest available cost and the client may be able to obtain the same or similar products or service at a lower cost from other providers. The client is under no obligation to accept any of the recommendations of the Advisor or use the services of any of the associated persons of the Advisor if they are recommended in a plan.

Portfolio Management

NGI offers discretionary and non-discretionary continuous portfolio management services where the investment advice provided is tailored to meet the needs and investment objectives of the client. The Firm offers an initial consultation in which pertinent information about the client's personal and financial circumstances and objectives is collected. As part of the investment management service, aspects of the client's financial affairs are reviewed in addition to answers provided in a risk tolerance questionnaire to help determine a suitable allocation. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. The Adviser periodically reviews a client's financial situation and portfolio through regular contact with the client which often includes an annual or semiannual meeting with the client. The adviser makes use of portfolio rebalancing software to bring portfolios back into their original allocation typically annually.

Discretionary Arrangements

Where NGI enters into discretionary arrangements with clients, NGI will be granted discretion and authority to manage the client's account subject to any written guidelines that client may provide. For instance, if a client wishes to not own a particular stock or stock in any company in a particular industry in their account (like the alcohol industry) screens will be placed on their individual account so that such companies are not owned in their account. It is possible that some funds may purchase these excluded stocks and the screen only applied to individual stocks owned outright in an account.

NGI is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions may include the determination of securities and the amount of securities to be purchased and/or sold. Once the portfolio is constructed, NGI provides ongoing supervision and rebalancing of the portfolio as changes in market conditions and client circumstances may require.

Non-Discretionary Arrangements

For non-discretionary portfolio management services, NGI will monitor the client's assets and will provide recommendations as to the client's asset allocation typically during review meetings. The client is free at all times to accept or reject any investment recommendation from NGI. For non-discretionary portfolio management, NGI will implement recommendations upon obtaining client approval. NGI rarely engages in non-discretionary arrangements.

Separate Account Management for Other Registered Investment Advisors

NGI makes investment models available to other Registered Investment Advisors as separate accounts. Under this type of arrangement other Registered Investment Advisors are solely responsible for determining the suitability of each strategy and its use for each of their clients. NGI only offers this service through Goldman Sachs Advisor Solutions (formerly Folio Institutional) in order to ensure that clients of NGI and clients of other Registered Investment Advisors have trades placed at identical times. Other Registered Investment Advisors pay a licensing fee directly to NGI dependant on the level of assets they have subscribed to a given model. NGI does not receive any fees directly from clients of other Registered Investment Advisors.

3rd Party Manager Recommendations & Solicitations

From time to time, representatives of NGI may recommend and solicit asset management of a 3rd party money manager. Full disclosure of any and all fees for such an arrangement would be disclosed at the time such solicitation takes place and would vary based on the 3rd party manager selected.

Workshops and Seminars

Representatives of NGI may conduct educational workshops and seminars. At times these events may be for a fee. See fees & compensation for further information.

The scope of work and fee for all of these services is provided to the client in writing prior to the start of the relationship. The agreement sets forth the services to be provided, the fees for the service and the agreement may be terminated by either party in writing at any time.

As of 2/28/2023 NGI manages approximately \$128 million in assets for approximately 250 clients all of which is managed on a discretionary basis.

Fees & Compensation

NGI is compensated in 3 ways - 1)A fixed flat fee 2)an hourly charge 3)a percentage of assets under management. Listed below is a description of each compensation arrangement as well as possible conflicts of interest regarding compensation.

The Adviser reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in the Adviser's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded.

Please visit page 14 to read about brokerage.

Fixed Flat Fee

The negotiable flat fee ranges from \$500 to \$10,000 per plan, depending on the complexity of a client's financial situation. Half the fee is due in advance, the rest upon presentation of the plan. In addition, the Advisor may charge fees for financial planning workshops. When it does so the fee is up to \$100, and is usually paid in advance, customarily through an online portal. IN ALL CASES, if a client cancels, any prepaid fees will be refunded on a pro-rated basis. Under no circumstances will NGI require prepayment of a fee more than 6 months in advance and in excess of \$500, as services will be rendered within six months of the date of contract.

Hourly Charge

The Adviser provides hourly services for clients in addition to services for a flat fee for written financial plans or for those who need advice on a limited scope of work. Hourly fees are agreed upon in advance, are negotiable and are paid after the consultations. The negotiable hourly fee is up to \$150.

Percentage of Assets Under Management

NGI manages client accounts (on a discretionary basis) for a negotiable fee based on a percentage of assets under management. Portfolio management fees may be negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of the client's financial circumstances, among others. The annualized maximum negotiable fee for portfolio management services are based on the following fee schedule:

Maximum Annual Fee Schedule For AGGREGATE Amount of All Similar Type Accounts Held at FolioFN:

First \$250,000	0.1834%	per month
\$250,000 - \$500,000	0.1750%	per month
\$500,000 - \$1 Million	0.1667%	per month
\$1 Million - \$2 Million	0.1584%	per month
\$2 Million+	0.1500%	per month

Note: Goldman Sachs Advisor Solutions typically charges a .0084% fee for retirement accounts in addition to the fee Next Generation Investing, LLC charges. This fee is not calculated into the above fee schedule.

The above fee schedule when invoiced to the client will appear as an annual percentage rather than as a monthly one. So in the example above the first \$250,000 will be billed 0.1834% per month, which works out to be 2.20% a year. The next \$250,000 would then be billed at 0.1750% per month (2.10% a year) and so on.

The .0084% fee charged by Goldman Sachs Advisor Solutions is for brokerage and custodial services. Whether 0 trades are placed in a given year or a trade is placed every day, the fee they charge is the same to the client. This setup allows our firm to do unlimited trading during select 'window' trading times available multiple times each day for \$0 in commission. If a trade needs to be placed outside the window trading time then a \$3.95 per security fee applies. It also allows the firm to have minimums waived on certain lower cost institutional mutual funds.

Goldman Sachs Advisor Solutions may have additional fees for certain services. A full listing of those fees can be found at <https://www.folioinstitutional.com/resources/service-fees.jsp>. These are separate and distinct from any fees charged by the Adviser and in addition to the .0084% brokerage/custodial charge.

Annual Fee Schedule For Accounts Held at Security Benefit:

All	1%	per year
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Note: Security Benefit typically charges a .25% annual fee in addition to the fee Next Generation Investing, LLC charges. This fee is not calculated into the above fee schedule. There is also a \$35 a year administrative fee charged by Security Benefit for each individual account with a value of less than \$50,000. Other fees may also apply from time to time, such as requests for distributions not processed through Security Benefit's website or if certain investments are selected.

At times a client's account may be invested in ETF's (exchange traded funds) or no-load mutual funds that carry additional internal fees to them. The fees and expenses charged by these product providers are separate and distinct from the management fee charged by the Adviser. These fees and expenses are described in each fund's prospectus or in the offering memorandums of a partnership. These fees will generally include a management fee, other fund expenses and a possible distribution fee. A client could invest in certain mutual funds or investment partnerships directly without the services of the Adviser.

Please note that the breakpoint pricing is NOT 'retroactive': when a breakpoint is surpassed, the fees assessed are reduced only for the assets above each breakpoint. For example, if the fee for the first \$250,000 in assets is 0.1834% and the fee for assets between \$250,000-\$500,000 is only 0.1750%, only the assets above \$250,000 are assessed the lower 0.1750% fee. The first \$250,000 would still be assessed a full 0.1834%. As an example, if a client had an account worth \$500,000 their fee for the account would be 0.1792%.

Please also note that fees for accounts at Goldman Sachs Advisor Solutions will be charged based on the total amount of all accounts of a similar type held at Goldman Sachs Advisor Solutions with Next Generation Investing, LLC and will be aggregated based on Social Security number. From time to time it may be advantageous for a client to open a separate account with a lower fee schedule on the Goldman Sachs Advisor Solutions platform. This account would not be charged the .084% fee but instead would be charged a commission for each transaction. These accounts would not count towards the aggregation total. Accounts held at Security Benefit will not be counted towards aggregate pricing breakpoints at Goldman Sachs Advisor Solutions either.

The fee will be based on the gross value of your accounts, and will be paid in advance monthly directly from your account. A bill showing the amount of the fee, how it was calculated, and the value of the assets upon which the bill is based will be made available through your login at Goldman Sachs Advisor Solutions for accounts held there. For accounts at Security Benefit, the amount billed will be on each statement. Fees may be assessed pro rata in the event the portfolio management agreement is executed at any other time other than the first day of a calendar month. Due to technology limitations on Security Benefit's platform the 1% annual fee will be billed at .09% of the account's value on the first month of each quarter and .08% on other months.

It is the responsibility of the client to verify the accuracy of all fee calculations. The agreement may be modified upon such terms as may be mutually agreed upon in writing. The agreement is terminable by you at any time, for any reason. Any fees paid in advance are nonrefundable, unless the client requests a refund in writing within 60 days of termination

of the agreement or within 60 days of their account being closed at Goldman Sachs Advisor Solutions or Security Benefit, whichever occurs first. In the event client requests in writing a refund of fees that were paid in advance, the fees will be refunded via check on a prorated basis. Either party may terminate the agreement upon written notice. The agreement is not assignable by Next Generation Investing, LLC without the advance written consent of the client. Goldman Sachs Advisor Solutions and Security Benefit do not offer a pro-rated refund of brokerage and/or custodial asset based fees nor do they offer a complete refund of fees charged if the client elects to transfer assets away prior to the end of the month.

Conflicts of Interest Between Different Fee Structures

The Adviser offers several different services detailed in this brochure that compensate the Adviser differently depending on the service selected. There is a conflict of interest for the Adviser and its associated personnel to recommend the services that offer a higher level of compensation to the Firm through either higher management fees or reduced administrative expenses.

Please note that this conflict of interest is different and in addition to those listed under the 'Financial Planning Services' heading listed under the 'Advisory Business' section, which can be viewed on pages 4 and 5 of this document.

The Adviser mitigates these conflicts through its procedures to review client accounts relative to the client or investors personal financial situation to ensure the investment management service provided is appropriate. Further, the Adviser is committed to its obligation to ensure associated persons adhere to the Firm's Code of Ethics and to ensure that the Firm and its associated persons fulfill their fiduciary duty to clients or investors.

Comparable services may be available elsewhere for less.

Please see page 15 for more information regarding brokerage.

Performance-Based Fees

NGI does not engage in any performance based fees.

Types of Clients

NGI generally provides investment advice to individuals, high net worth individuals, trusts, estates, charitable organizations, endowments, corporations or business entities, and other Registered Investment Advisors as subaccount managers.

Account Minimums

Generally, NGI requires a combined household account minimum of \$300,000 for asset management services and a net worth of at least \$1,000,000 for financial planning services. However, in its sole discretion, NGI may waive or lower this minimum.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

We utilize the following methods of analysis to determine which securities to buy, sell, or hold:

Fundamental Analysis

Involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. It 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.

Technical Analysis

Involves the analysis of past market data; primarily price and volume. It attempts to predict a future security price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is the markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical Analysis

Involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. It assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Charting Analysis

Involves the use of patterns in performance charts. NGL uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. It involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Quantitative Analysis

Involves the use of mathematical models. It attempts to obtain more accurate measurement of a company's quantifiable data (such as the value of a share price or earnings per share) and predict changes to that data. The risk involved in solely using this method is it uses models that may be based on assumptions that prove to be incorrect.

Other

In addition to the previous methods of analysis, NGI uses as sources of information to aide in security selection and buy/sell timing decisions financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, the purchase of outside trade signals, prospectuses, filings with the Securities and Exchange Commission, company press releases, and companies that store databases of securities information such as Morningstar and Yahoo Finance.

Risks with all forms of analysis

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information

Investment Strategies

Strategies involved in accounts we manage on a discretionary basis include long-term purchases, short-term purchases, and trading.

Long Term Purchases

These are purchases with hold times of longer than 1 year. A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. It could also result in larger losses to a client than if a security was sold after a shorter hold time.

Short Term Purchases

These are purchases with hold times of less than 1 year. A risk in a short-term purchase strategy is that, by holding the security for this length of time, we may not take advantage of long-term gains that could be profitable to a client. It could also result in larger losses to a client than if a security was sold after a longer hold time. Less favorable tax treatment of short-term capital gains is another downside to this strategy versus long-term purchases.

Trading

These are purchases with hold times of less than 30 days. The risks are similar to those of short term purchases and there is even less favorable tax treatment with the possibility of wash sale rules. Normally increased brokerage and other transaction-related costs would also hurt performance using a trading strategy, but the use of the unique 'window trading' our firm utilizes through Goldman Sachs Advisor Solutions nullifies much of this. Strategies that engage primarily in a trading purchase strategy are not used for taxable accounts at our firm due to the potential tax consequences. Rarely will a taxable account managed on a discretionary basis by our firm hold a security for less than 30 days.

Other

Some of the investment models used in accounts managed by our firm may use leverage and/or inverse funds. Inverse funds are designed to increase in value when a particular index they are tracking (such as the S&P 500) decreases in value. The risk in using these types of funds is that they decrease in value when the index they are trying to track increases in value. There is also the risk that the fund does not accomplish their stated goal of performing in an inverse manner. Leveraged funds are designed to increase in value on a daily basis a multiple amount (as much as 2 times) in relation to the particular index they are tracking. So, if the index they were tracking went up 1% in a given day the fund will likely go up 2% in that same day. The risk in using these types of funds is that they decrease in value a multiple amount as well and substantial losses can occur quickly when the index they are trying to track decreases in value. There is also the risk that the fund does not accomplish their stated goal of performing close to or exactly the amount of leverage stated. Some funds are both leveraged and inverse funds and carry both risks.

We may also place a substantial amount or all of an account in a single ticker diversified open ended mutual fund. The risk in doing this is that a particular portfolio manager or management team may fail to deliver.

Risk of Loss

Securities investments involve risks and are not guaranteed. Investing in them may result in losing part or all of your investment.

Legal and Disciplinary Information

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Clients should be aware that the receipt of additional compensation by our firm, its management team or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. The client is never under any obligation to act on any of these recommendations through agents of NGI and is free to implement the advice elsewhere. Some advice for which a client paid a fee for may require services available outside of NGI that include

- 1) use of insurance products that pay sales commissions in order to implement
- 2) use of a broker/dealer that pay sales commissions in order to implement
- 3) use of a tax preparation company that charges fees in order to implement
- 4) use of a Registered Investment Advisor that is not NGI in order to implement

Insurance Affiliations

Investment adviser representatives of NGI may be licensed to sell insurance products through various independent insurance agencies. In some instances, certain investment adviser representatives may sell insurance products through their independently owned insurance agency. In either case, these investment adviser representatives, in their capacity as independent insurance agents, may sell insurance products to advisory clients. These individuals receive normal and customary commissions as a result of selling insurance as well as advisory fees for providing advisory services through NGI.

Clients are under no obligation, contractually or otherwise, to purchase insurance products or receive investment advice through these associated persons in their separate capacities as insurance agents and/or advisory representatives of NGI. However, if a client freely chooses to implement a plan that suggests the use of insurance through such individuals commissions/fees will be earned in addition to any fees paid for advisory services provided by the Firm.

Brokerage Affiliations

Separate and distinct from NGI, investment advisor representative of NGI may be Registered Representatives of World Equity Group Inc., a registered broker/dealer. NGI and World Equity Group Inc. are unaffiliated firms. Investment advisor representatives of NGI may suggest that clients place transactions through World Equity Group Inc. for which they would earn normal commissions and fees.

Clients may, but are not required to use the services of the broker/dealer with which the Investment Adviser Representatives are affiliated. The Advisor does not make any representation that the brokerage services are at the lowest cost available and clients may be able to obtain those services and/or products at a more favorable rate elsewhere.

Tax Preparation Affiliations

Investment adviser representatives of NGI may own a tax preparation service separate and distinct from NGI. Investment advisor representatives of NGI may suggest that clients engage in tax preparation services with this firm for which the investment advisor representative would receive additional revenue from tax preparation fees.

Clients may, but are not required to use the services of these tax preparation services. The Advisor does not make any representation that the tax preparation services are at the lowest cost available and clients may be able to obtain those services and/or products at a more favorable rate elsewhere.

How We Address Conflicts of Interest

NGI addresses conflicts of interest by putting the interest of its clients first as part of its fiduciary duty as a registered investment advisor. It discloses to clients the existence of all material conflicts, whether it be someone with the firm recommending additional or more expensive firm services from the firm for which they would earn additional fees or recommending additional products and/or services available outside of the firm which would pay additional compensation to the individual recommending them. It also discloses to clients that they are not obligated to engage or purchase recommended investment products or services from any of our employees.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

NGI has adopted a Code of Ethics which establishes ideals for ethical conduct based upon fundamental concept of openness, integrity, honesty & trust. The Code of Ethics includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions and Personal Trading

From time to time, NGI or persons associated with NGI may buy or sell securities that are recommended to its clients or securities in which its clients are invested. This presents a conflict of interest. To mitigate this conflict, it is NGI's policy that associated persons or NGI shall not have priority over a client's account in the purchase or sale of securities. Employees or persons associated may be invested in the same investment models recommended to clients at Goldman Sachs Advisor Solutions and the same mutual funds available at Security Benefit. In this case there is no conflict of interest as orders are executed simultaneous to client orders.

Brokerage Practices

Brokerage Selection and Soft Dollars

If a client wants the applicant to recommend a broker and/or custodian, they will get a recommendation based on the broker's and/or custodian's costs, skills, reputation, dependability and compatibility with the client. Goldman Sachs Advisor Solutions and Security Benefit are the firms generally recommended for custodial and clearing services for most clients. Some advice may require the use of a broker/dealer in order to implement. If clients want the applicant to implement such advice, World Equity Group Inc. will be recommended to them. NOTE: Clients may be able to obtain lower fees and commissions from other brokers, and the value of research, products and services given to the applicant is not a factor in determining the selection of broker/dealers or the reasonableness of their fees or commissions. Also, World Equity Group Inc, Goldman Sachs Advisor Solutions, Security Benefit, and Next Generation Investing, LLC, are all separate and unrelated companies.

The research products and services that NGI may receive from brokerage firms may include financial publications, information about particular companies or industries, and other products or services that provide lawful and appropriate assistance to the Firm in the performance of its investment decision-making responsibilities. Such research products and service are provided to all investment advisors who utilize these firms and are not considered to be paid for with soft dollars. However, the commissions charged by a particular broker for a particular transaction, or set of transactions, may be greater than the amounts another broker who did not provide research services or products might charge.

Order Aggregation

The nature of the clients and/or trading activity on behalf of client accounts are such that trade aggregation does not garner any client benefit.

Directing Brokerage for Client Referrals

The Adviser and its associated persons do not receive client referrals from broker/dealers or third parties as consideration for selecting or recommending brokers for client accounts.

Directed Brokerage

In limited circumstances and at the Firm's discretion, some clients may instruct NGI to use one or more particular brokers for the transactions in their accounts. Clients who may want to direct the Firm to use a particular broker should understand that this may prevent NGI from effectively negotiating brokerage compensation on their behalf and may also prevent NGI from obtaining the most favorable net price and execution. Moreover, clients that direct brokerage may incur additional costs for performance reporting. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that they obtain through their broker are adequately favorable in comparison to those that NGI would otherwise obtain for clients.

Review of Accounts

Managed accounts are monitored on an ongoing basis and financial planning accounts are typically reviewed annually. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's financial or personal situation. NGI doesn't prepare regular client reports, but on occasion may do so. Clients get statements from their broker/dealers and custodians, as appropriate, but no less than quarterly.

Client Referrals and Other Compensation

NGI does not engage in the practice of paying a client referral fee to outside solicitors, but investment advisor representatives may be permitted to engage in a paid testimonial and/or endorsement outside of the firm with written approval by the Designated Supervisor.

Custody

Custody Policy

NGI does not accept or permit the Firm or its associated persons from obtaining custody of client assets including cash, securities, acting as trustee, provide bill paying service, have password access to control account activity or any other form of controlling client assets besides buying/selling securities. The only exception would be for immediate family members.

All checks or wire transfer to fund client accounts are required to be made out to/sent to the account custodian.

Account Statements

All assets are held at qualified custodians and the custodians provide account statement not less than quarterly to clients. Clients should carefully review such statements for any discrepancies or inaccuracies.

Performance Reports

Pursuant to recent amendments to Rule 206(4) under the Investment Advisers Act of 1940, the Securities and Exchange Commission now requires advisers to urge clients to compare the information set forth in any statement from the Adviser with the statements received directly from the custodian to ensure accuracy of all account transactions.

Investment Discretion

Clients can grant NGI complete discretion over the selection and amount of securities to be purchased or sold without obtaining their prior consent or approval. However, NGI's investment authority may be subject to specified investment objectives, guidelines and/or conditions imposed by the client. For example, a client may specify restrictions or prohibitions of transactions on certain securities or for securities of a particular industry. Before assuming this authority clients fill out a risk tolerance questionnaire and sign an investment advisory agreement granting discretionary trading authority. Where the Firm enters into non-discretionary arrangements with clients, NGI will implement recommended transactions upon obtaining client approval.

Voting Client Securities

NGI will not vote nor advise clients how to vote proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. NGI does not give advice or take any action with respect to the voting of these proxies. For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Proxy voting information is provided to clients directly from the custodian.

Financial Information

NGI does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. NGI meets all net capital requirements that it is subject to and NGI has not been the subject of a bankruptcy petition in the last 10 years.

Professional Liability Insurance Disclosure

The investment advisors of the firm have professional liability insurance coverage, for which proof through a copy of the insurance agreement can be obtained within 30 days by a request from any client or prospective client.

Part 2B Supplement

Shumaker, Roger Wayne

Born in 1961: attended Washburn University: has been a securities registered representative with Next Financial Group (2006 to 2014), was an investment advisor representative with NEXT Financial Group (in its capacity as an RIA), was a securities registered representative with TCM Securities (2014 to 2019), and is a securities registered representative with World Equity Group, Inc. He is an independent insurance agent & consultant (1987 to present) and is 50% owner of Retirement & Tax Solutions, a tax preparation firm (1996 to present).

Roger does not have any material disciplinary events to disclose.

Roger is engaged in the following other business activities besides giving investment advice through NGI, which accounts for 25% of his time: Fixed insurance sales- 20%, Notary Services- <1%, Shumaker Development LLC- 5%, Independence Tax Service LLC- 10%, Registered Representative with World Equity Group, Inc- 35%, Fee Based Estate Planning & Long-Term Care Planning- 5%, and he does business as The Retirement Team.

Part 2B Supplement

Shumaker, Ryan Wayne

Born in 1985: BGS in psychology & BS in economics from The University of Kansas (2007); was a securities registered representative and investment advisor representative with NEXT Financial Group (2008 to 2014), was a securities registered representative with TCM Securities (2014 to 2019), is a securities registered representative of World Equity Group Inc. (2019 to present) and is an independent insurance agent (2008 to present).

Ryan does not have any material disciplinary events to disclose.

Ryan is engaged in the following other business activities besides giving investment advice through NGI, which accounts for 70% of his time: doing business as The Retirement Team, which accounts for 30% of his time and includes being a Registered Representative with World Equity Group, Inc, estate planning, long-term care planning, long-term care and insurance consulting, insurance sales, tax planning, research and marketing.

Part 2B Supplement

Kasten, Joel Parker

Born in 1987: Received a bachelor of arts in political science from the University of Kansas (2009) and is a securities registered representative of World Equity Inc. (2022 to present) and an independent insurance agent (2014 to present).

Joel does not have any material disciplinary events to disclose.

Joel is engaged in the following other business activities besides giving investment advice through NGI, which account for 70% of his time: being a Registered Representative with World Equity Group, Inc account for 20% and working as an independent life/health/annuity insurance agent, which accounts for 10%.