



**Ehlert Financial Group, Inc.**  
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**[www.ehlertfinancialgroup.com](http://www.ehlertfinancialgroup.com)**  
**March 25, 2011**

This Brochure provides information about the qualifications and business practices of EHLERT FINANCIAL GROUP, INC. (EFG). If you have any questions about the contents of this Brochure, please contact us at [mehlert@ehlertfinancialgroup.com](mailto:mehlert@ehlertfinancialgroup.com) or 847-522-8080. 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.

EHLERT FINANCIAL GROUP, INC. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about EHLERT FINANCIAL GROUP, INC. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to Clients as required by SEC Rules. This Brochure dated March 25, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide Clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to Clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Mary Heil, Operations Manager at 847-522-8080 ext. 214 or [mheil@ehlertfinancialgroup.com](mailto:mheil@ehlertfinancialgroup.com). Our Brochure is also available on our web site [www.ehlertfinancialgroup.com](http://www.ehlertfinancialgroup.com), also free of charge.

Additional information about EHLERT FINANCIAL GROUP, INC. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with “EFG” who are registered, or are required to be registered, as investment adviser representatives of “EFG”.

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## Item 4 – Advisory Business

Ehlert Financial Group was established in 1990 to serve the needs of families who were looking for overall objective financial planning for their future. Over the years, we have expanded to include business planning, special needs life care planning, wealth strategy and insurance solutions. We have found that our Clients depend on us to find them solutions, "no matter what". If we cannot find the answers, we consider it our job to find a resource to help our Clients with their concerns.

Our practice is generally focused on three core Client groups:

- The emotionally-charged, intricate planning situations for families with special needs children and adults. We work very closely with our sister company, Protected Tomorrows.
- Business owners, entrepreneurs and executives and their families; dealing with multifaceted, complex situations, complete with illiquid or closely held assets, and
- People struggling with an uncertain financial future – be it their retirement, caring for their parents, divorce, death of a spouse, funding their children's education or determining how to transfer their legacy.

Ehlert Financial Group is solely owned by Mary Anne Ehlert, CFP®.

These services include the following:

- **Comprehensive Financial Planning**

Advice is rendered in the areas of cash flow and debt management, risk management, college funding, retirement planning, estate planning, tax planning, asset allocation and investment strategies. Planning may also include charitable and philanthropic planning as well as other areas that may be of importance to the Client. EFG employs fundamental, long-term financial planning and investment strategies, although other investment strategies may be employed as requested. There are no minimums imposed by EFG for the size of investment holds or net worth of its Clients. In specific cases, at the Client's request, EFG may be engaged to provide scheduled or periodic reviews of the Client's investment holdings, e.g. on a quarterly basis.

- **Specific Project Services**

Upon request, specific planning services may be provided to Clients who do not want or need a comprehensive plan. These services typically include portfolio analysis or retirement planning.

- **Ongoing Portfolio Development And Consulting**

EFG provides investment advisory services, defined as giving continuous advice to a Client or making investments for a Client based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, EFG develops a Client's personal investment policy and creates and supervises a portfolio based on that policy. Account supervision is guided by the stated objectives of the Client (i.e., maximum capital appreciation, growth, income, or growth and income).

EFG may utilize the services of investment advisory firms which will provide the ongoing investment portfolio development, with EFG providing the allocation oversight.

EFG may provide this as a development service (with EFG placing trades on the Client's behalf) only to Clients who have brokerage accounts with M Holdings Securities, Inc., a broker-dealer with which EFG's President is a registered representative. If a Client wants ongoing supervision of his or her portfolio but wants to use another broker-dealer, EFG will call the Client with recommendations that the Client will have to place directly with the selected broker-dealer.

- **Asset Management Programs**

EFG provides discretionary investment advisory services, defined as giving continuous advice to a Client or making investments for a Client based on the individual needs of the Client. Investment recommendations are designed to meet the specific needs of the Client. EFG works with the Client to explain and identify the investment strategies and programs available to them. EFG has relationships with separate account managers as well as access to a wrap fee program that might meet the needs of the specific Client. If a separate account manager is chosen, the relationship with that account manager is clearly defined.

## **ADVISORY SERVICES – CRITERIA FOR INVESTMENT**

All investments currently held by the Client are researched to determine their appropriateness in achieving the stated goals of the Client. All relevant fundamental

information such as economic conditions, earnings, industry outlook, politics, historical data, general level of interest rates, tax benefits, and inflation outlook is used in the analysis. While the plan will make generic recommendations for future investment, EFG will evaluate specific investments upon request. These recommendations are not limited to the securities offered by any particular broker-dealer.

Implementation of planning recommendations is strictly at the discretion of the Client. Recommendations may include using EFG for ongoing management or consulting services or using the services of one or more separate account managers.

EFG also provides advice on matters not involving securities, including retirement planning, estate planning, and planning for persons with special needs.

## **MANAGEMENT OF CLIENT ASSETS**

As of December 31, 2010, the amount of Client assets managed on a discretionary basis are \$55,595,765. Client assets managed on a non-discretionary basis are \$46,106,519.

### **Item 5 – Fees and Compensation**

Fees are based on the type of service requested. All fees are subject to negotiation. The types of service related fees are as follows:

- **Comprehensive Financial Planning Fees**

Fees are based on the number of hours scheduled to gather and analyze the Client's data and to prepare the written plan. The hourly rate is based on the level of expertise of the persons involved in each stage of preparing the plan, including gathering the data, compiling information on programs and services available for persons with special needs (if applicable), researching investments, and preparing the plan. The hourly rate for the firm's president is \$300 per hour, based on her many years of experience in this field.

Fees typically range from \$1000 for a simple allocation and retirement plan for a single person or couple with no dependents or extended family, to \$25,000 for a plan that covers planning for several generations of family members, including planning for the immediate, short-term, and long-term needs of persons with special needs. As the financial requirements of individuals and families vary greatly from person to person, there is no fixed schedule of fees. The planning fee will directly reflect the overall complexity of the plan and the skill level of the EFG staff needed to complete the plan. Fees may be either paid quarterly in advance or the Client may pay a retainer (the amount of which to be determined with the Client), with a

balance due upon presentation of the plan. Retainers will typically be required for Clients who do not elect the quarterly billing option.

The amount of the retainer will be negotiated with the Client and will typically not exceed 50% of the estimated fee. No Client is required to pay any fee more than 6 months in advance.

- **Specific Project Fees**

Specific planning services will be billed at an hourly rate of \$100 to \$300, based on the level of expertise of the person(s) involved in the project, and shall be due and payable as earned.

- **Ongoing Portfolio Development And Consulting Fees**

Fees are based on the number of hours scheduled to gather and analyze the Client's data and to prepare and supervise the Client's portfolio. The hourly rate is between \$100 and \$300, depending upon the level of expertise of the individual(s) involved in gathering data, researching investments, and providing the service. Clients will be invoiced at the end of each calendar quarter.

- **Asset Management Fees**

The specific manner in which fees are charged by EFG for asset management is established in a Client's written agreement with EFG. EFG will generally bill its fees on a quarterly basis. Clients may elect to be billed directly for fees or to authorize EFG to directly debit fees from Client accounts. Typical asset management fees are:

<i>Account Assets</i>	<i>Management Fee (annualized)</i>	<i>+ Custodial Fee</i>	<i>= Program Fee (annualized)</i>
On first \$500,000*	1.20%	0.10%	1.30%
On next \$500,000	1.19%	0.10%	1.29%
On next \$2,000,000	1.15%	0.10%	1.25%
Over \$3,000,000	1.10%	0.10%	1.20%

\* Custodian's portion of the Program Fee is 10 basis points, but is subject to a \$250 minimum. This will cause the Program Fee to be higher for Accounts valued at less than \$250,000 (for example, for an Account valued at \$100,000, the maximum Program Fee will be 1.67%).

Fees may vary from the schedule due to particular circumstances or if the Client and EFG negotiate otherwise.

Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

## **PAYMENT OF FEES**

The manner in which fees are charged and collected are dependent on the type of service selected. These are described in each section above in detail.

- Planning Fees are typically paid quarterly in advance.
- Specific Project Fees are hourly and billed as earned.
- Ongoing Portfolio Development and Consulting Fees are charged hourly and invoiced at the end of each calendar quarter.
- Asset Management Fees are billed to the Client quarterly typically in arrears, as specified in the written agreement with the Client. These fees are based on the value of the account at the close of the Client's billing period. Clients may elect to have these fees billed directly or to authorize EFG to directly debit fees from the Client's account.

Prior to the effective date of any change in fees, EFG will notify the Client in writing. The Client has the option of terminating his or her agreement with EFG before the effective date of the increase.

## **FEES AND OTHER EXPENSES**

In addition to the fees described below, Clients may bear other costs associated with investments or accounts including but not limited to:

- custodial charges, brokerage fees, commissions and related costs;
- interest expenses;
- taxes, duties and other governmental charges;
- deferred sales charges;
- odd-lot differentials;
- transfer and registration fees or similar expenses;
- costs associated with foreign exchange transactions;
- other portfolio expenses; and
- costs, expenses and fees (including, investment advisory and other fees charged by investment advisers with, or funds in, which the Client's account invests)

associated with products or services that may be necessary or incidental to such investments or accounts.

With respect to such services (which may include, but are not limited to, custodial, securities lending, brokerage, futures, banking, consulting or third-party advisory services), each Client will be required to establish business relationships with relevant service providers or other counterparties based on the Client's own credit standing.

### **PRE-PAYMENT OF FEES**

Fees are typically billed quarterly. No fee will be payable six or more months in advance of the services rendered. In the event of the termination of a relationship, unearned fees, if any, paid in advance will be refunded to the Client. To the extent fees have been earned but not yet billed, such fees will be pro-rated and paid by the Client upon termination.

### **GENERAL INFORMATION ON FEES:**

In certain circumstances, all fees and account minimums may be negotiable.

All fees paid to EFG for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a Client may pay an initial or deferred sales charge. When investing in mutual funds, it is important to recognize that the use of funds that have fees such as sales charges may cause a conflict of interest for EFG, as EFG may receive compensation. EFG has an internal investment review process to ascertain the investment recommendations are in the best interest of the Client, and EFG procedures require disclosure of the fees to the Client. These types of investments are not typically used if other alternatives are available.

A Client could invest in a mutual fund directly, without the services of EFG. In that case, the Client would not receive the services provided by EFG which are designed, among other things, to assist the Client in determining which mutual fund or funds are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both fees charged by the funds and the fees charged by EFG to fully understand the total amount of fee to be paid by the Client and to thereby evaluate the advisory services being provided.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

EFG does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a Client).

## **Item 7 – Types of Clients**

EFG provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, trusts, estates or charitable organizations, and corporations or business entities not otherwise specified.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

In general, EFG seeks to build diversified investment portfolios while balancing our Clients' time horizon, risk tolerance, flexibility requirements, and other investment constraints. The EFG investment process uses broad diversification, systematic portfolio risk management and regular rebalancing to maintain the investment objectives of the Client. The main sources of information are financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, mutual fund and private fund prospectuses, filing with the Securities and Exchange Commission, and corporate press releases.

EFG's investment strategies primarily involve long-term purchases (securities held at least one year) and short-term purchases (securities sold within one year). These may extend to exchange – listed, over-the-counter and foreign securities, corporate, municipal, and foreign and US government debt securities, including those guaranteed by such government or issued by their agencies. It may also include certificates of deposit and mutual fund shares. Not all of these strategies are appropriate for all Clients; only those strategies believed to be suitable will be utilized in any given Client or advisory program. It is anticipated that there may be a substantial degree of uniformity in Client portfolios of the same investment style as a result of common investment objectives of the Clients who have selected that style.

### **MATERIAL RISKS**

Client investments are subject to a number of risks, including the risk that security prices may decline over short or even extended periods, adverse economic, political or financial market conditions, and interest rate increases. The following types of risks may significantly affect the performance of a Client's investment portfolio:

**Liquidity Risk:** the risk that a particular investment may be difficult to purchase or sell and that the Client may be unable to sell illiquid securities at an advantageous time or price or achieve its desired level of exposure to a certain sector.

**Equity Risk:** the risk that the value of equity securities, such as common stocks and preferred stocks, may decline due to general market conditions which are not specifically related to a particular company or to factors affecting a particular industry or industries. Equity securities generally have greater price volatility than fixed income securities.

**Foreign Securities Risk:** the risk that adverse legal, political, or economic developments, as well as international trade, trade barriers, and exchange controls may adversely affect companies located in such countries.

**Management Risk:** the risk that the investment techniques and risk analyses applied by EFG will produce the desired results and that legislative, regulatory, or tax developments may affect the investment techniques available to EFG and the individual portfolio program in connection with managing the Client accounts. There is no guarantee that the investment objectives of the Clients will be achieved.

**Interest Rate Risk:** the risk that fixed income securities will decline in value because of an increase in interest rates; a Client account with longer average portfolio duration will be more sensitive to changes in interest rates than a fund with shorter average portfolio duration.

**Credit Risk:** the risk that a Client could lose money if the issuer or guarantor of a fixed income security, or the counterparty to a derivative contract, is unable or unwilling to meet its financial obligations.

**High Yield Risk:** the risk that high yield securities and unrated securities of similar credit quality (commonly known as “junk bonds”) are subject to greater levels of credit and liquidity risks. High yield securities are considered primarily speculative with respect to the issuer’s continuing ability to make principal and interest payments.

**Real Estate Risk:** the risk that a Fund’s investment in Real Estate Investment Trusts (“REITs”) or real estate-linked derivative instruments will subject the Clients to risks similar to those associated with direct ownership of real estate, including losses from casualty or condemnation, and changes in local and general economic conditions, supply and demand, interest rates, zoning laws, regulatory limitations on rents, property taxes and operating expenses. A Client’s investments in REITs or real estate-like derivative instruments subject it to management and tax risk.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of EFG or the integrity of EFG's management. EFG has no information applicable to this Item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

EFG is a registered investment adviser. Financial planning activities are conducted through this entity. The principal executive officer of EFG is also separately licensed to M Holdings Securities, Inc. as a registered representative.

Any financial planning, consultation or advice furnished by EFG and any fee or charge made for such service is not in any way connected to M Financial Group, M Holdings Securities, Inc. or any of their affiliates.

The principal executive officer and other persons associated with EFG are separately licensed as insurance agents or brokers for various insurance companies. These individuals may purchase insurance for any Client for separate and typical compensation. No Client is obligated to use these individuals to purchase insurance.

Individuals associated with EFG are registered representatives of M Holdings Securities, Inc.

In the capacity of acting as a registered representative, this individual may receive separate and typical compensation for implementing Client transactions. While acting as an investment adviser representative of M Securities or EFG, accounts are either referred to outside Registered Investment Advisers or portfolios are managed directly on a continuous basis.

While these individuals endeavor at all times to put the interest of the Clients first as part of EFG's fiduciary duty, Clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

The principal executive officer is also the President of Protected Tomorrows, Inc., a firm that provides methods and tools to professionals who work with families with a family member with disabilities. EFG may also provide special needs planning and consulting services that do not involve advice about securities. These services are provided for separate and typical compensation.

The principal executive officer is also President of LifeCare Design Studio, LLC, an architecture that provides residential solutions to families with a family member with disabilities.

The principal executive officer is a Principal of Tomorrows Careers, LLC, a firm that specializes in job assessment, placement and job coaching to individuals with disabilities.

The principal executive officer is also a member of several boards of directors of non-profit organizations

These individuals may spend as much as 50% of their time with all of these related activities.

### **Item 11 – Code of Ethics**

EFG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at EFG must acknowledge the terms of the Code of Ethics annually, or as amended.

EFG anticipates that, in appropriate circumstances, consistent with Clients' investment objectives, it will cause accounts over which EFG has management authority to effect, and will recommend to investment advisory Clients or prospective Clients, the purchase or sale of securities in which EFG, its affiliates and/or Clients, directly or indirectly, have a position of interest. EFG's employees and persons associated with EFG are required to follow EFG's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of EFG and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for EFG's Clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of EFG will not interfere with (i) making decisions in the best interest of advisory Clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of EFG's Clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to Client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as Clients, there is a possibility that employees might benefit from market activity by a Client in a security held by an employee. Employee trading is continually

monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between EFG and its Clients.

EFG's Clients or prospective Clients may request a copy of the firm's Code of Ethics by contacting Mary Heil, Operations Manager, at 847-522-8080 ext. 214 or [mheil@ehlertfinancialgroup.com](mailto:mheil@ehlertfinancialgroup.com).

## Item 12 – Brokerage Practices

The principal executive officer of EFG is separately registered as a representative of M Holdings Securities, Inc., a broker-dealer and NASD member firm. M Holdings Securities, Inc. is required to supervise the securities trading activities of its representatives

A number of EFG's staff and registered Investment Advisory Representatives are licensed and associated with M Holdings Securities Broker-Dealer.

The associated persons of EFG are separately registered as representatives of M Holdings Securities, Inc., a NASD registered broker-dealer. In general, EFG will recommend the use of M Holdings Securities and these individuals to Clients for implementation of planning recommendations, provided that this recommendation is consistent with EFG's fiduciary duty to the Client. Any commissions or other compensation received from the implementation of planning recommendations is separate and distinct from EFG's advisory fee. No financial planning Client is obligated to use M Holdings Securities, Inc. to implement any recommended transactions.

Clients should be aware the best execution and lower commissions may not necessarily be achieved if recommended transactions are placed through these individuals, in their separate capacities as registered representatives or insurance agents/brokers.

EFG will neither place trades for nor recommend brokers to Ongoing Portfolio Consulting Services Clients. These Clients have elected to place their own trades with brokers of their own choosing.

## Item 13 – Review of Accounts

### FREQUENCY AND NATURE OF REVIEW

Personnel of EFG review Client accounts regularly depending upon the type of service provided.

- **Comprehensive Financial Planning** – Accounts are reviewed annually or as contracted for at the inception of the advisory relationship.

- **Ongoing Portfolio Development** – The securities are reviewed at least annually, with more frequent reviews for active portfolios.
- **Asset Management** - The securities are reviewed at least quarterly, with more frequent reviews for active portfolios.

EFG verifies that trades have been properly executed and that the positions held by Clients are accurate and appropriate. EFG personnel also review the performance of each account and adherence to Clients' objectives and investment guidelines.

EFG's President supervises all reviews.

### **FACTORS PROMPTING A NON-PERIODIC REVIEW OF ACCOUNTS**

From time to time, circumstances and event necessitate EFG's review of Client accounts in between regular reviews. These include significant market events, extraordinary change in the price of a security held by one or more Clients and highly irregular account activity.

### **CONTENT AND FREQUENCY OF REGULAR ACCOUNT REPORTS**

Clients will receive regular reports from their broker-dealers and/or custodians. In addition assets management Clients will receive quarterly performance reports while their assets are managed by EFG. EFG may deliver such reports electronically in accordance with the investment advisory agreement between EFG and the Client.

## **Item 14 – Client Referrals and Other Compensation**

### **ADDITIONAL COMPENSATION**

From time to time, EFG personnel receive invitations that involve entertainment, travel and other benefits from companies who provide services directly and indirectly to Clients, including broker-dealers that execute Client trades and banks that custody Client assets. EFG recognizes that it has a duty to act solely for the benefit of the Clients.

Accepting gifts and entertainment can cause a conflict of interest, or the appearance of a conflict between personal interest and professional responsibility. EFG's culture is to never accept gifts or entertainment from any service provider or any person the associate has reason to believe may be seeking to influence business decisions or transactions. Receipt by EFG personnel of travel, entertainment, gifts and other gratuities could have the result of influencing such personnel and EFG to favor such service providers over other service providers that might provide superior services to Clients at lower costs.

EFG personnel are subject to a gifts and entertainment policy that is designed to address the conflicts of interest. EFG personnel are not permitted to either give to or receive gifts from Clients, service providers or other business-related parties that have a total annual cumulative value greater than \$100. Generally acceptable items are those promotional items (t-shirts, pens, coffee mugs, etc.) that are imprinted with a company logo, and other items of nominal value. Participating in lunches, dinners or social events hosted by service providers or business-related outside entities is acceptable if it does not represent a conflict of interest or impropriety, and the general value is within policy limits.

The principal executive officers and other employees of EFG may, from time to time, receive 12b-1 distribution fees from investment companies in connection with the placement of Client funds into investment companies.

EFG's President was formerly associated with Vestor Capital Corporation. Vestor Capital Corporation still provides investment advice to certain EFG Clients and receives separate and typical compensation from Vestor for this service.

For programs where EFG is serving as a solicitor or sub-adviser, typical compensation is received. These programs are not affiliated with M Holdings Securities, Inc.

## **Item 15 – Custody**

EFG does not take custody of Client assets. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains Client's investment assets. EFG urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

EFG may receive discretionary authority from the Client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular Client account.

Investment guidelines and restrictions must be provided to EFG in writing. In order for EFG to exercise investment discretion over a particular Client's account, that Client must execute a power of attorney and investment management agreement, each of which gives EFG the express authority to make discretionary trades on behalf of the Client.

## Item 17 – Voting Client Securities

As a matter of firm policy and practice, EFG does not have any authority to and does not vote proxies on behalf of advisory Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in Client portfolios. EFG may provide advice to Clients regarding the Clients' voting of proxies.

## Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about EFG's financial condition. EFG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients, and has not been the subject of a bankruptcy proceeding.

## Item 19 – Requirements for State-Registered Advisers

### EDUCATION AND BUSINESS STANDARDS

Advisory persons associated with EFG must possess, minimally, the following:

- At least 2 years in the field of investment management, AND
- Bachelor's degree from an accredited college, a CFP® or CFA designation, OR
- At least 5 years financial experience

EFG advisory personnel include:

Mary Anne Ehlert, CFP®	President
Marilyn Zilka, CFP®	Financial Planner
William Hoffman, CFP®	Director Risk Management & Insurance Solutions

Specific information about the advisory personnel above follows on the remaining pages.

**EDUCATION:**

Attended 2 year program in Computer Science at Harper College  
Attended Business Administration curriculum at Loyola University  
Attained CFP® designation 1993

**EMPLOYMENT HISTORY:**

Ehlert Financial Group, Inc., President	01/1991 to present
M Financial Group, Member	09/2004 to present
M Holdings Securities, Inc., Registered Representative	09/2004 to present
NYLIFE Securities, Inc., Registered Representative	11/1999 to 08/2004
Eagle Strategies, Inc.	01/2000 to 08/2004
New York Life Insurance Co., Insurance Agent	12/1990 to 08/2004
Protected Tomorrows, Inc., President	May 2002 to present
Vestor Capital Corp., Registered Representative	05/1995 to 10/1999
Citicorp, Vice President, Distr. Finance Business	1989-1990
Heller Financial, Vice President, Marketing and Strategy	1985-1989
Deutsche Credit, Vice President, Systems	1980-1985

Mary Anne Ehlert also serves on the Boards of several organizations:

National Disability Institute	2010 – present
The Special Needs Network	NFP, 2001 to present
The Special Olympics, IL	2005 to present
Gateway to Learning, IL	2006 to present
Bardwell Scholarship Fund	2003 to present

**EDUCATION:**

BS in Finance, Trinity University	1989
Attained CFP® designation	2000

**EMPLOYMENT HISTORY:**

M Holdings Securities, Inc., Registered Representative	12/2008 to present
Ehlert Financial Group, Inc., VP, Operations, Senior Planner	11/2008 to present
Virtus Private Wealth Management, Director	04/2007 to 11/2008
Virtus Securities, Registered Representative	05/2008 to 08/2008
Regal Securities, Registered Representative	05/2007 to 11/2008
Self-Employed, Financial Planner	08/2006 to 04/2007
New York Life Insurance Company, Lic Service Asst	08/2000 to 10/2006
NYLIFE Securities, Registered Representative	08/2006 to 10/2006
LWVG, Inc, Financial Planner	08/2000 to 08/2006
Covenant Wealth Management, Financial Planner	08/1999 to 08/2000
Self-Employed, Securities Trader	04/1997 to 07/1999
AT&T, Senior Account Executive	10/1991 - 04/1997
William is a Trustee on the Board of the Rise School of Austin	2000 - present.

**EDUCATION:**

MBA in Finance, Loyola University	1981
BA in Economics, Northwestern University	1975
FP® Professional Education Program, College for Financial Planning	2006
Attained CFP® designation	2007

**EMPLOYMENT HISTORY:**

Ehlert Financial Group, Inc., Senior Planner	04/2007 to present
M Holdings Securities, Inc., Registered Representative	04/2007 to present
Banc of America Securities, VP, Institutional Equity Sales	03/2002 to 06/2006
UBS Warburg, Sr VP, Global Equity Sales	11/2000 to 03/2001
Paine Webber, Inc, Global Equity Sales	06/1986 to 11/2000
Paine Webber, Inc, Operations Manager	06/1977 to 06/1986
Mitchell, Hutchins, Inc., Asst Commodity Op Manager	1976 to 06/1977