Firm CRD No. 316747



# Form ADV Part 2A – Firm Disclosure Brochure

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March 15, 2025

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of The Financial Resource Center ("the firm"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (317) 871-8571 or by email at <u>evan@tfrcinc.com</u>. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about the firm to assist you in determining whether to retain the firm. Additional information about The Financial Resource Center is available on the SEC's website at <u>www.adviserinfo.sec.gov</u> by searching our CRD number 316747.

# Item 2 – Material Changes

There are no material changes to disclose since the previous annual filing on March 02, 2024.

At any time, the current Disclosure Brochure is available on the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching the firm name or CRD number 316747. A copy of this Disclosure Brochure may be requested at any time, by contacting (317) 871-8571 or by email at <u>evan@tfrcinc.com</u>.



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#### Item 4 – Advisory Business

#### **Firm Information**

The Financial Resource Center was incorporated in Indiana as a C Corp and registered as an independent investment adviser in 2021. The firm conducts business as The Financial Resource Center and is regulated by the United States Securities and Exchange Commission (SEC).

This disclosure brochure provides information regarding the qualifications, business practices and details of the advisory services and the applicable fees.

#### **Principal Owner**

#### Carol J. Lane, CFP<sup>®</sup>, CMFC<sup>®</sup>

Carol has over thirty-five years of financial planning experience and serves as an Investment Advisor Representative in addition being the owner. Carol has a bachelor's degree from Purdue University.

#### Asset Management

The Financial Resource Center provides asset management services (discretionary or non-discretionary) primarily to individual Clients and high-net worth individuals. Accounts are managed based on the individual goals, objectives, time horizon, and risk tolerance of each Client. Once a Client's goals have been established, the firm will customize appropriate strategies, as listed below, to suit a Client's objectives and risk profile.

- Retirement Strategies
- Investment Management
- Estate Conservation
- Estate Transfer

- Succession Planning
- Wealth Accumulation
- Wealth Management
- Tax Management

Investment Advisor Representatives are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a particular Client are dependent upon the scope and complexity of the Client's financial situation. At no time will The Financial Resource Center accept or maintain actual custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account pursuant to the Client investment advisory agreement.

- Investment advice is not limited to certain investment types.
- There is generally a minimum of \$250,000 to open or maintain an account.
- Advisory services are tailored to the individual need of each Client.
- Clients may place reasonable restrictions on investing in certain types of securities.

#### **SEI Mutual Fund Models Program**

The Financial Resource Center offers asset management services through the SEI Mutual Fund Models Program

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("SEI Program") based on the individual needs of clients. Within the SEI Program, we will select a mutual fund model created by SEI that is generally comprised exclusively of mutual funds in the SEI family of funds ("SEI Funds"). We will assist clients in selecting models that are consistent with their investment objective and goals, and we will help them select a rebalancing frequency for their account. SEI will be responsible for rebalancing the portfolio according to their targeted asset allocations. Client assets in the SEI Program are held at SEI Private Trust Company as the custodian. While The Financial Resource Center can assist clients completing the custodian's paperwork, the client is ultimately responsible for providing the necessary information to establish the account. Clients will retain all rights of ownership on the account, including the right to withdraw securities or cash, vote proxies, and receive transaction confirmations. In addition, clients will also have the ability to impose restrictions on investing in certain securities or types of securities at the time they open the account. In order to hire The Financial Resource Center to provide management services, the client will be asked to enter into a written investment advisory agreement with us for the SEI Program. This agreement will set forth the terms and conditions of our relationship, including the amount of your investment advisory fee.

# **Financial Planning Services**

The Financial Resource Center offers personal financial planning tailored to the individual needs of each client for their retirement and/or non-retirement account(s). The services can be incorporated into a comprehensive asset management engagement or by separate agreement, taking into account information collected from the client such as financial status, investment objectives and tax status, among other data. Such services may be included as part of a comprehensive asset management engagement or provided separately for a separate fee. Fees for such services are negotiable and detailed in the client agreement. The financial plan may include generic recommendations as to general types of investment products or specific securities which may be appropriate for the client to purchase given his/her financial situation and objectives. The client is under no obligation to act upon the investment adviser's recommendation or purchase such securities. Financial planning is available but not limited to:

- Retirement Planning
- Education Planning
- Major Purchase
- Divorce Planning
- Insurance Planning
- Final Expenses
- Estate Planning
- Cash Flow / Budgeting
- Accumulation Planning
- Tax Planning
- Inheritance Planning
- Business Planning

The amount of time required per plan can vary greatly depending on the scope and complexity of an individual engagement.

# Retirement Plan Consulting

Investment advisor representatives of The Financial Resource Center may assist clients that are trustees or other fiduciaries to retirement plans ("Plans") by providing fee-based consulting and/or advisory services. Investment advisor representatives may perform one or more of the following services, as selected by the client in the client agreement:

• Assistance in the preparation or review of an investment policy statement ("IPS") for the Plan based

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upon consultation with Client to ascertain Plan's investment objectives and constraints.

- Acting as a liaison between the Plan and service providers, product sponsors or vendors.
- Ongoing monitoring of investment manager(s) or investments in relation to the criteria specified in the Plan's IPS or other written guidelines provided by the Client.
- Preparation of reports describing the performance of Plan investment manager(s) or investments, as well as comparing the performance to benchmarks.
- Ongoing recommendations, for consideration and selection by client, about specific investments to be held by the Plan or, in the case of a participant-directed defined contribution plan, to be made available as investment options under the Plan.
- Education or training for the members of the Plan investment committee with regard to various matters, including plan features, retirement readiness matters, service on the committee, and fiduciary responsibilities.
- Assistance in enrolling Plan participants in the Plan, including conducting an agreed upon number of enrollment meetings.

As part of such meetings, IARs may provide participants with information about the Plan, which may include information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of pre-retirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, investment advisor representatives do not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if participants in the Plan may invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or may obtain participant loans, investment advisor representatives do not provide any individualized advice or recommendations to the participants regarding these decisions.

Such services provided as an investment advisor are subject to the Investment Advisers Act of 1940 ("Advisers Act"), and the advisor is a fiduciary under the Advisers Act with respect to such services. In addition, if client elects to engage an investment advisor representatives to perform ongoing investment monitoring and ongoing investment recommendation services to a Plan subject to ERISA in the client agreement, such services will constitute "investment advice" under Section 3(21)(A)(ii) of ERISA. Therefore, the investment advisor representatives will be deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of ERISA in

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connection with those services. Clients should understand that to the extent the IAR is engaged to perform services other than ongoing investment monitoring and recommendations, those services are not "investment advice" under ERISA and therefore, the IAR will not be a "fiduciary" under ERISA with respect to those other services. From time to time the IAR may make the Plan or Plan participants aware of and may offer services available from IAR that are separate and apart from the services provided under Retirement Plan Consulting. Such other services may be services to the Plan, to a client with respect to client's responsibilities to the Plan and/or to one or more Plan participants. In offering any such services, the IAR is not acting as a fiduciary under ERISA with respect to such offering of services. If any such separate services are offered to a client, the client will make an independent assessment of such services without reliance on the advice or judgment of the IAR.

At no time will The Financial Resource Center accept or maintain custody of a Client's funds or securities, except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated custodial account, pursuant to the Client investment advisory agreement.

# **Retirement Plan Rollovers**

An employee generally has four (4) options for their retirement plan when they leave an employer:

- 1. Leave the money in his/her former employer's plan, if permitted
- 2. Rollover the assets to his/her new employer's plan if one is available and permitted
- 3. Rollover to an Individual Retirement Account (IRA), or
- 4. Cash out the account value, which has significant tax considerations

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney. If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

- Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
- Employer retirement plans generally have a more limited investment menu than IRAs.
- Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
- Your current plan may have lower fees than our fees.

If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because Investment Advisor Representatives have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under

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no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each. An employee will typically be investing only in mutual funds, you should understand the cost structure of the share classes, available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA. Clients should understand the various products and services they might take advantage of at an IRA provider and the potential costs of those products and services.

- Our strategy may have higher risk than the option(s) provided to you in your plan.
- Your current plan may also offer financial advice.
- If you keep your assets titled in a 401k or retirement account, participants could potentially delay their required minimum distribution beyond the normal RMD age.
- A 401(k) may offer more liability protection than a rollover IRA; each state may vary.
- Participants may be able to take out a loan on your 401k, but not from an IRA.
- IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
- If company stock is owned in a plan, participants may be able to liquidate those shares at a lower capital gains tax rate.
- Plans may allow Advisor to be hired as the manager and keep the assets titled in the plan name.

Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.

It is important to understand the differences between these types of accounts and to decide whether a rollover is the best option. Prior to proceeding, if you have questions contact your Investment Adviser Representative, or call our main number as listed on the cover page of this brochure. When Advisor provides 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 Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts

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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. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Advisor also provides educational services to retirement plan participants with assets that could potentially be rolled-over to an IRA advisory account. Education is based on a particular Client's financial circumstances and best interests. Again, Advisor has an incentive to recommend such a rollover based on the compensation received, which is mitigated by the fiduciary duty to act in a Client's best interest and acting accordingly.

# **Client Account Management**

Prior to engaging The Financial Resource Center to provide investment advisory services, each Client is required to enter into an investment advisory agreement that defines the terms, conditions, authority, and responsibilities.

# Artificial Intelligence

Artificial Intelligence (AI) is the simulation of human intelligence in machines designed to think and learn like humans. AI encompasses a range of technologies that enable systems to perform tasks such as recognizing speech, making decisions, and understanding complex ideas. AI tools can be used to enhance our services, improve operational efficiency, and deliver overall better outcomes. By integrating AI into our processes, we aim to stay at the forefront of technological innovation while maintaining a strong commitment to ethical practices and data privacy. The Financial Resource Center utilizes AI for real-time note-taking to enhance accuracy, efficiency, and productivity. Our AI tool transcribes spoken content, generates summaries, and identifies key takeaways. Participants are informed of AI usage and have the right to opt out of AI-generated note-taking. Should a client have any questions or concerns, please contact us at our email address, phone number, or website. In addition to real-time note-taking, The Financial Resource Center uses AI to gather general insights and manage projects. By analyzing large volumes of data and identifying patterns, AI helps us develop preliminary concepts, streamline research processes, and enhance decision-making. This allows The Financial Resource Center to focus on more complex and creative aspects of our work, ultimately delivering more comprehensive and effective solutions for our clients. We ensure that any use of AI is supervised and conducted with transparency, maintaining the highest standards of data privacy and ethical practices.

While artificial intelligence technologies aim to enhance efficiency, accuracy, and investment outcomes, their use introduces specific risks that clients should consider. Using AI in decision-making can result in

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overreliance on technology, potentially reducing human oversight. Unexpected system malfunctions, algorithmic errors, or misinterpretations of AI-generated insights could adversely affect investment outcomes. The Financial Resource Center requires human oversight of AI tools. Clients are encouraged to discuss any concerns about AI-related risks.

# **Assets Under Management**

Assets under management will be amended at least annually within 90 of the fiscal year end of December 31st.

Assets under Management (02/18/2025)					
Discretionary	\$0.00	Non-Discretionary	\$407,168,352		

# Item 5 – Fees and Compensation

#### Investment Management

Fees are generally paid quarterly in arrears based on the average daily market value not to exceed 2% based on the scope, complexity, amount of time and expertise required. Retirement plan consulting fees are in advance.

- Clients will receive quarterly statements from the Custodian that provides details of the advisory fees.
- The investment advisory fee in the first period of service is pro-rated from the inception date of the account[s] to the end of the first quarter.
- The firm will not have the authority or responsibility to value portfolio securities.

# **Mutual Fund Share Class Disclosures**

The Financial Resource Center strives to select the lowest cost share class available; however, certain mutual fund share classes charge a 12b-1 fee that generally amounts to an additional .25% expense ratio or more. The purpose of 12b-1 fees, as approved by the SEC, are to cover marketing expenses and shareholder services such as support services and "other expenses" such as legal, accounting and the administrative functions of the custodian. When selecting a mutual fund, Investment Advisor Representatives have a fiduciary duty to choose the share class that helps manage the overall fee structure of the account. The entire fee structure includes such fees as the asset management fee, the expense ratio and ticket charges. (Ticket Charges are rebated to the Client.)

- Mutual funds typically offer multiple share classes, including lower-cost share classes that do not charge 12b-1 fees and are therefore usually less expensive.
- Investment Advisor Representatives will consider investing Client's funds in 12b-1 fee-paying share classes even when a lower-cost share class is available as appropriate to account for the overall fee structure and tax considerations as well as attributes of a fund not available for lesser fees.



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# **Financial Planning**

The fee for financial planning is based on fixed or hourly rate depending on the nature of the planning. Fixed fees are generally paid 50% in advance with the balance due upon completion.

Hourly Rate	Fixed Rate	
\$350 to \$400 per hour	\$1,750 to \$3,000 per quarter	

The applicable fee is determined by the scope and complexity of a particular Client's financial situation as well as the amount of time and expertise required. In some cases, a fee greater or lesser then the typical fee range may be warranted. Financial planning fees are payable by check to The Financial Resource Center.

#### **Hourly Consulting Fees**

The hourly consulting fee will be based on the type of services to be provided, experience and expertise, and the sophistication and bargaining power of the client. Individual complexities will determine the fixed fee charged based on the number of hours estimated to complete the plan but not billed based on actual hours. A higher or lower fee may apply under extenuating circumstances and requires approval by the Chief Compliance Officer.

Clients are not "fit" into a particular service level, but a plan is designed to be specific to each individual client and their unique circumstances. The following criteria will be considered as appropriate when determining the number of hours expected to create a client specific financial plan.

- Total Income
- Net Worth
- Marital Status
- Tax Bracket
- Assets under Management
- Children
- Education Costs
- Timeframe
- Number of Accounts

- Risk Tolerance
- Objectives
- Account Types and Holdings
- Investment Experience
- Budget
- Expected number of Meetings
- Phone Conferences
- Amount of material required to review

# **Compensation for Sales of Securities**

The Financial Resource Center does not receive commission compensation for advisory services.

# **Other Fees and Expenses**

Clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees. Also, Clients will pay the following separately incurred expenses, which we do not receive any

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part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses). If a Client's assets are invested in mutual funds or other pooled investment products, Clients should be aware that there will be two layers of advisory fees and expenses for those assets. Clients will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Clients will also pay Advisor the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, Clients could generally avoid the second layer of fees by not using the management services of The Financial Resource Center and by making their own investment decisions. Further information regarding fees assessed by a mutual fund is available in the appropriate prospectus.

# **Termination**

A contract between The Financial Resource Center and a Client may be cancelled at any time with thirty (30) days prior written notice. Clients will be given this brochure form ADV Part 2A, forty-eight hours in advance of signing an agreement or they will have five business days to unconditionally cancel the agreement.

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

The Financial Resource Center does not accept performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a Client (such as a Client that is in a hedge fund or other pooled investment vehicle).

The Financial Resource Center also does not participate in side-by-side management, where an advisor manages accounts that are both charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

# Item 7 – Types of Clients

The firm generally provides investment advice to individuals and high net worth individuals, but services are available to other types of Clients.

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

The Financial Resource Center emphasizes on-going and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of primarily mutual funds (80%) and Common Stock (20%).

The Clients' individual investment strategy is tailored to their specific needs and designed to meet a particular investment objective and time frame. Once the appropriate portfolio has been determined, it is subject to review and rebalancing based upon the Client's individual needs, stated goals and objectives. Each Client can place reasonable restrictions on the types of investments to be held in the portfolio.

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The Financial Resource Center uses multiple forms of research to analyze financial data and market conditions such as the general financial health of a company, and/or the analysis of management or competitive advantages, past market data (primarily price and volume), business cycles as well as patterns and trends.

# **Risk of Loss**

Investing in securities involves certain investment risks. Securities can fluctuate in value or lose value up to the entire principal amount invested. Clients should be prepared to bear the potential risk of loss. The Financial Resource Center will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. Investment Advisor Representatives monitor economic indicators to determine if adjustments to strategic allocations are appropriate.

The Financial Resource Center will rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information.

- It is the responsibility of the Client to advise The Financial Resource Center of any changes in financial condition, goals or other changes to their profile.
- The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts.

The firm's methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations. Clients should be aware of the following types of risks that apply to investing and are encouraged to discuss the specific risks applicable to their account holdings:

- Artificial Intelligence The Financial Resource Center utilizes Artificial Intelligence (AI) and/or Machine Learning (ML) technologies in certain aspects of its advisory services. While these technologies aim to enhance efficiency, accuracy, and investment outcomes, their use introduces specific risks that clients should consider. The use of AI in decision-making can result in overreliance on technology, potentially reducing human oversight. Unexpected system malfunctions, algorithmic errors, or misinterpretations of AI-generated insights could adversely affect investment outcomes. Advisor requires human oversight of AI tools. Clients are encouraged to discuss any concerns about AI-related risks.
- **Business Risk** the measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.

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- **Call Risk** the risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Credit Risk** the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- Currency/Exchange Rate Risk the risk of a change in the price of one currency against another.
- Exchange Traded Fund and Mutual Fund Risk The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients may incur additional costs associated with ETFs and mutual funds (see Item 5). Consumer Discretionary ETF Shares are listed for trading on NYSE Arca and can be bought and sold on the secondary market at market prices. Although it is expected that the market price of a Consumer Discretionary ETF Share typically will approximate its net asset value (NAV), there may be times when the market price and the NAV vary significantly. Thus, the client may pay more or less than NAV when the Consumer Discretionary ETF Shares are listed for trading on NYSE Arca, it is possible that an active trading market may not be maintained and Trading of Consumer Discretionary ETF Shares on NYSE Arca may be halted by the activation of individual or market wide "circuit breakers" (which halt trading for a specific period of time when the price of a particular security or overall market prices decline by a specified percentage). Trading of Consumer Discretionary ETF Shares may also be halted if the shares are delisted.
- **Fixed Income Risk** When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Inflationary Risk the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- Interest Rate Risk the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- Legislative Risk the risk of a legislative ruling resulting in adverse consequences.
- Liquidity Risk the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.

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- **Margin Risk** the risk of losing more money than initially invested due to the amplified effect of losses when investing with borrowed money.
- **Market Risk** the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Pandemic Risk** Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **Reinvestment Risk** the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political** the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Transparency Risk** the risk of not having ready access to required financial information about a company, such as price levels, market depth, and audited financial reports.

All investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

# **Types of Investments**

The Financial Resource Center generally manages Clients' portfolios that consist of mutual funds, Exchange Traded Equities (ETFs) and individual securities.

- Cash and Cash Equivalents Cash is money in the form of currency, which includes all bills, coins, and currency notes. Cash and cash equivalents refer to the line item on the balance sheet that reports the value of a company's assets that are cash or can be converted into cash immediately. Cash equivalents include bank accounts and marketable securities, which are debt securities with maturities of less than 90 days. Examples of cash equivalents include commercial paper, Treasury bills, and short-term government bonds with a maturity date of three months or less. Marketable securities and money market holdings are considered cash equivalents because they are liquid and not subject to material fluctuations in value
- Exchange Traded Funds (ETFs) An ETF is a portfolio of securities invested to track a market index similar to an index mutual fund, but the shares are traded on an exchange like an equity. An ETF share price fluctuates intraday depending on market conditions instead of having a net asset value (NAV) that is calculated once at the end of the day. The shares may trade at a premium or discount; and as a result,

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investors pay more or less when purchasing shares and receive more or less than when selling shares. The supply of ETF shares is regulated through a mechanism known as creation and redemption that involves large, specialized investors, known as authorized participants (APs). Authorized participants are large financial institutions with a high degree of buying power, such as market makers, banks or investment companies that provide market liquidity. When there is a shortage of shares in the market, the authorized participant creates more (creation). Conversely, the authorized participant will reduce shares in circulation (redemption) when supply falls short of demand. Multiple authorized participants help improve the liquidity of a particular ETF and stabilize the share price. To the extent that authorized participants cannot or are otherwise unwilling to engage in creation and redemption transactions, shares of an ETF tend to trade at a significant discount or premium and may face trading halts and delisting from the exchange. The performance of ETFs is subject to market risk, including the complete loss of principal. ETFs also have a trading risk based on cost inefficiency if the ETFs are actively traded and a liquidity risk if the ETFs has a large price spread and low trading volume. In addition, investors buying or selling shares in the secondary market pay brokerage commissions, which may be a significant proportional cost not incurred by mutual funds.

- Equity An investment that generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **Fixed Income** Investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Mutual Funds** a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
  - Open-End Mutual Funds a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus Clients may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

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- Closed-End Mutual Funds a type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed, and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide income or liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, Clients may be unable to liquidate all or a portion of their shares in these types of funds.
- Alternative Strategy Mutual Funds Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry. Additional types of investments will be considered per Client for asset allocation and risk management purposes.

#### **Item 9 – Disciplinary Information**

There are no legal, regulatory, or disciplinary events involving The Financial Resource Center or any of its Supervised Persons.

#### Item 10 - Other Financial Industry Activities and Affiliations

#### **Registered Representatives**

Neither The Financial Resource Center nor any of the management persons are registered or has a registration pending to register as a broker/dealer or a registered representative of a broker/dealer.

#### **Insurance Agency Affiliations**

Advisory Persons are also a licensed insurance professional but continue to have fiduciary duty to act in Client's best interest. Implementations of insurance recommendations are separate and apart from one's role with The Financial Resource Center. As an insurance professional, Advisory Persons receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. Clients are under no obligation to implement any recommendations made by the Investment Advisor Representative in their capacity as an insurance agent.

This chart is intended to explain the potential capacity a Financial Advisor can serve, and the type of compensation received.

Capacity	Compensation
Investment Advisor Representatives	Advisory Fee
Insurance Agent	Commissions

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Conflicts of interests exist because securities and insurance sales create an incentive to recommend products based on the compensation earned rather than the best interests of the Client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer.

# Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither The Financial Resource Center nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

# Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

# Code of Ethics

The Financial Resource Center has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with the firm (our "Covered Persons<sup>1</sup>"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Clients. The firm and its Covered Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of the firm's Covered Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (317) 871-8571 or by email at evan@tfrcinc.com.

# Personal Trading with Material Interest

The Financial Resource Center does not act as principal in any transactions. In addition, the firm does not act as the general partner of a fund or advise an investment company. The Financial Resource Center does not have a material interest in any securities traded in Client accounts.

# Personal Trading in Same Securities as Clients

Certain covered persons are considered "access" persons. An access person is a covered person who has access to nonpublic information regarding the purchase or the sale of securities, is involved in making securities recommendations to Clients or who has access to such recommendations that are nonpublic. All holdings and accounts, where an access person has a direct or indirect beneficial ownership or the ability to exercise control or influence and any account belonging to a dependent family Client of the same household (including a trust) is subject to trade monitoring.

The firm allows access persons to maintain personal securities accounts and/or holdings. Access persons must notify the Chief Compliance Officer of, and receive prior approval for, opening accounts or holding personal securities and/or holdings. Access persons are required to provide duplicate statements for review.

# Personal Trading at Same Time as Client

Supervised Persons may not purchase or sell any security immediately prior to or immediately after a

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transaction being implemented for an advisory account, thereby preventing an employee from benefiting from transactions placed on behalf of advisory accounts.

# Item 12 – Brokerage Practices

The Financial Resource Center uses SEI Investments as the qualified custodian for Client accounts. SEI Investments provides customers trade confirmations and quarterly statements.

# Soft Dollars

Soft dollars are revenue programs offered by broker/dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services.

• The Financial Resource Center has not entered a soft dollar agreement.

SEI Investments makes available various products and services designed to assist the firm in managing and administering Client accounts. These services include software and other technology that provide access to Client account data (such as trade confirmation and account statements); facilitation of trade execution (and research reports or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making.

• The services provided by SEI Investments are economic benefits not soft dollars.

# **Brokerage Referrals**

The Financial Resource Center does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

# **Directed Brokerage**

The Financial Resource Center does not accept directed brokerage arrangements (when a Client requires that account transactions be affected through a specific broker-dealer).

# **Transaction Fees**

The Custodian charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). The Custodian enables The Financial Resource Center to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. The Custodian's commission rates are generally discounted from customary retail commission rates.

# **Best Execution**

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a custodian's services, including the value of research provided, execution capability, commission rates, and responsiveness.

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Accordingly, although we will seek competitive rates, to the benefit of all Clients, we may not necessarily obtain the lowest possible commission rates for specific Client account transactions.

#### **Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as price, size of order and difficulty of execution.

The Financial Resource Center does not aggregate purchases and sales for various Client accounts, but orders can be aggregated by the custodian.

#### Cash Sweep Program

Investment portfolios often include a cash allocation to maintain liquidity, manage risk, and provide funds for opportunistic investments. Cash allocations can serve as a buffer against market volatility and ensure funds are readily available for future investment opportunities or withdrawals. Sweep programs automatically transfer uninvested cash from a brokerage account into a money market fund or other short-term investment vehicle at the custodian. This process is automated and occurs regularly, often at the end of each business day. While the cash is held in the sweep account, it earns interest. This ensures that even idle cash generates some return, albeit typically lower than other investment options. By automating cash movement, sweep programs reduce the need for manual transfers, saving time and minimizing the risk of human error in managing cash balances. Sweep accounts provide quick access to cash for reinvestment or withdrawals, enhancing liquidity management within the portfolio. Minimizing manual cash management tasks reduces administrative burdens for investors and advisors, allowing them to focus on strategic investment decisions. Sweep programs often offer lower interest rates than short-term investments like high-yield savings accounts or CDs. This is due to their liquidity and convenience. While convenient, the lower interest rates mean that investors can miss out on higher returns if cash is kept in the sweep account for extended periods. The advisor uses sweep programs strategically to manage cash flows within a portfolio, ensuring that cash is readily available for investment opportunities without sacrificing significant returns. Sweep accounts can also be used to facilitate regular transactions, such as automatic withdrawals for living expenses or periodic investments in other asset classes. While sweep programs offer convenience and liquidity, they require careful consideration as part of an overall investment strategy. Advisors and clients should weigh the benefits of liquidity and automation against the potential for higher returns through alternative cash management strategies.

# Item 13 – Review of Accounts

Account reviews are conducted on an ongoing basis by the Investment Advisor Representative. At a minimum, each Client relationship is reviewed annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may also be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify The Financial Resource Center if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material

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market, economic or political events. Clients will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client can also establish electronic access to the Custodian's website so they can view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

#### Item 14 - Client Referrals and Other Compensation

The Financial Resource Center is a fee only advisory firm, that is compensated by its Clients to provide investment advice and not from any investment product or someone other than the Client. The Financial Resource Center does not receive commissions or other economic benefit or compensation from product sponsors, broker/dealers or any un-related third party. The investment advisor representative may receive additional cash or non-cash compensation from advisory product sponsors. Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives.

#### **Client Referrals from Solicitors**

#### **Compensation Client Referrals from Solicitors**

The Financial Resource Center does not compensate solicitors for client referrals.

#### Item 15 – Custody

The Financial Resource Center does not accept or maintain actual custody of funds or securities. However, the firm does have the ability to directly deduct advisory fees from Client accounts, which amounts to constructive custody.

Fee deductions are based on an invoice being sent to the qualified custodian and concurrently to Clients. The invoice includes the amount of the fee, the value of Client's assets on which the fee was based, and the specific manner in which the fee was calculated as well as the name of the custodian. On a quarterly basis, the custodian will provide a report detailing account performance and a holdings analysis as well as an overview and portfolio commentary. The report will also include a reminder to promptly advise of any changes to financial situation, investment objectives, or investment restrictions. Clients are urged to compare the account statements they receive from the qualified custodian with invoices received from The Financial Resource Center.

• The Financial Resource Center is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities.

# Item 16 – Investment Discretion

The Financial Resource Center offers discretionary and non-discretionary asset management services. For discretionary accounts, Clients will execute a Limited Power of Attorney, which will grant our firm discretion

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over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients can impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. For non-discretionary accounts, The Financial Resource Center will confirm all trades with the Client prior to execution.

#### Item 17 – Voting Client Securities

The Financial Resource Center does not accept proxy-voting responsibility for any Clients. Clients will receive proxy statements directly from the Custodian. The Financial Resource Center will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### **Item 18 – Financial Information**

Neither the firm, nor its management, have any adverse financial situations to disclose and have not been subject to a bankruptcy or financial compromise.

• The firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.





# Carol J. Lane

# Form ADV Part 2B – Individual Disclosure Brochure

9640 Commerce Drive, Suite 414 | Carmel, IN 46032 (317) 871-8571 | <u>www.tfrcinc.com</u>

March 15, 2025

This brochure supplement provides information about your Investment Advisor Representative that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through The Financial Resource Center as a registered investment advisor. Please contact The Financial Resource Center at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

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#### Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: Carol J. Lane

Born: 1960

# Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Purdue University, BS - Animal Science (1982)

#### **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

# The Financial Resource Center

Owner and Investment Advisor Representative 10/2021 – Present

# Cambridge Investment Research Advisors, Inc.

Investment Advisor Representative & Registered Representation 03/2005 – 08/2021

# **Professional Designations**

Ms. Lane has achieved the designations below. If you would like additional information you may discuss with her or visit the issuing entities website.

# AIF<sup>®</sup>- Accredited Investment Fiduciary

The AIF<sup>®</sup> Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF<sup>®</sup> Designation, the individual must:

(1) meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development,

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(2) complete a training program,



- (3) successfully pass a comprehensive, closed-book final examination under the supervision of an approved proctor, and
- (4) agree to abide by the AIF<sup>®</sup> Designee Code of Ethics. In order to maintain the AIF<sup>®</sup> Designation, the individual must annually attest to being in compliance with the AIF<sup>®</sup> Designee Code of Ethics and accrue and report a minimum of twelve (12) hours of continuing education. The AIF<sup>®</sup> Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

# Certified Financial Planner<sup>TM</sup> - CFP<sup>®</sup>

The CERTIFIED FINANCIAL PLANNER<sup>™</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the "CFP<sup>®</sup> marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> certification. It is recognized in the United States and a number of other countries for its:

- (1) high standard of professional education;
- (2) stringent code of conduct and standards of practice; and,
- (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP<sup>®</sup> marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). As part of earning the CFP certification, college or university level coursework through the CFP Board Registration Program must be completed. CFP\* professionals are well versed in these major personal financial planning areas: Professional Conduct and Regulation, General Principles of Financial Planning, Risk Management and Insurance Planning, Investment Planning, Tax Planning, Retirement Savings and Income Planning, Estate Planning, Psychology of Financial Planning, Financial Plan Development (Capstone Course);

**Examination** – Pass the comprehensive CFP<sup>®</sup> Certification Examination. The CFP<sup>®</sup> exam is a 170question, multiple-choice test that consists of two 3-hour sections during one day. Each section is divided into two distinct subsections. The exam includes stand-alone questions, as well as questions associated with case studies;

**Experience** – Complete at least two years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> professionals.

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Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP<sup>®</sup> marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care. This means CFP<sup>®</sup> professionals must provide financial planning services in the best interests of their clients. CFP<sup>®</sup> professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP<sup>®</sup> certification.

#### **CMFC®-** Chartered Mutual Fund Counselor

CMFC<sup>®</sup> designee's obtain knowledge of mutual funds and their various uses as investment vehicles. The CMFC<sup>®</sup> is issued by the College for Financial Planning. While there are no pre-requisites for the CMFC<sup>®</sup> the designee is required to complete nine self-study modules complete with a final online, closed book, proctored exam. In addition, the designee is required to complete 16 hours of continuing education every two years.

#### **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

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Ms. Lane has no other business activity to disclose.

#### Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Ms. Lane does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through The Financial Resource Center.

#### Item 6 – Supervision

This section explains how The Financial Resource Center provides supervisory oversight.

The Financial Resource Center maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Mr. Evan T. Lane serves as the Chief Compliance Officer and is responsible for supervising all activities. Mr. Lane is also responsible for administering the policies and procedures and the system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements. Mr. Lane can be reached at (317) 871-8571 or <u>evan@tfrcinc.com</u>.



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# Evan T. Lane

# Form ADV Part 2A – Individual Disclosure Brochure

9640 Commerce Drive, Suite 414 | Carmel, IN 46032 (317) 871-8571 | <u>www.tfrcinc.com</u>

March 15, 2025

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#### Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: Evan T. Lane

Born: 1990

# Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Purdue University - B.S. Agribusiness Management (2013) and B.S. Financial Counseling & Planning (2013)

Wabash College (2009 – 2010)

# **Professional Designations**

Mr. Lane has achieved the designations below. If you would like additional information you may discuss with him or visit the issuing entities website.

# AIF<sup>®</sup>- Accredited Investment Fiduciary

The AIF<sup>®</sup> Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF<sup>®</sup> Designation, the individual must:

- (1) meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development,
- (2) complete a training program,
- (3) successfully pass a comprehensive, closed-book final examination under the supervision of an approved proctor, and
- (4) agree to abide by the AIF<sup>®</sup> Designee Code of Ethics. In order to maintain the AIF<sup>®</sup> Designation, the individual must annually attest to being in compliance with the AIF<sup>®</sup> Designee Code of Ethics and accrue and report a minimum of twelve (12) hours of continuing education. The AIF<sup>®</sup> Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.



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#### Certified Financial Planner<sup>™</sup> - CFP<sup>®</sup>

The CERTIFIED FINANCIAL PLANNER<sup>™</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the "CFP<sup>®</sup> marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> certification. It is recognized in the United States and a number of other countries for its:

- (1) high standard of professional education;
- (2) stringent code of conduct and standards of practice; and,
- (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP<sup>®</sup> marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). As part of earning the CFP certification, college or university level coursework through the CFP Board Registration Program must be completed. CFP\* professionals are well versed in these major personal financial planning areas: Professional Conduct and Regulation, General Principles of Financial Planning, Risk Management and Insurance Planning, Investment Planning, Tax Planning, Retirement Savings and Income Planning, Estate Planning, Psychology of Financial Planning, Financial Plan Development (Capstone Course);

**Examination** – Pass the comprehensive CFP<sup>®</sup> Certification Examination. The CFP<sup>®</sup> exam is a 170question, multiple-choice test that consists of two 3-hour sections during one day. Each section is divided into two distinct subsections. The exam includes stand-alone questions, as well as questions associated with case studies;

**Experience** – Complete at least two years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP<sup>®</sup> marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

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**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care. This means CFP<sup>®</sup> professionals must provide financial planning services in the best interests of their clients. CFP<sup>®</sup> professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP<sup>®</sup> certification.

#### **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

#### **The Financial Resource Center**

Chief Compliance Officer and Investment Advisor Representative 09/2021 – Present

#### Cambridge Investment Research Advisors, Inc.

Investment Advisor Representative & Registered Representation 07/2013 – 08/2021

#### **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

Mr. Lane has no other financial industry business activities to disclose.



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#### Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mr. Lane does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through The Financial Resource Center.

#### Item 6 – Supervision

This section explains how The Financial Resource Center provides supervisory oversight.

The Financial Resource Center maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Mr. Lane also serves as the Chief Compliance Officer and is responsible for supervising all activities. Mr. Lane is also responsible for administering the policies and procedures and the system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements. Mr. Lane can be reached at (317) 871-8571 or evan@tfrcinc.com



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# Jerry M. King

# Form ADV Part 2A – Firm Disclosure Brochure

9640 Commerce Drive, Suite 414 | Carmel, IN 46032 (317) 871-8571 | <u>www.tfrcinc.com</u>

March 15, 2025

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THE THE RESOURCE CENTER,

#### Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: Jerry M. King

Born: 1946

# Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Mount Vernon Bible College - Attended (1968)

# **Professional Designations**

Mr. King has achieved the designations below. If you would like additional information you may discuss with him or visit the issuing entities website.

# AIF<sup>®</sup>- Accredited Investment Fiduciary

The AIF<sup>®</sup> Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF<sup>®</sup> Designation, the individual must:

- (1) meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development,
- (2) complete a training program,
- (3) successfully pass a comprehensive, closed-book final examination under the supervision of an approved proctor, and
- (4) agree to abide by the AIF<sup>®</sup> Designee Code of Ethics. In order to maintain the AIF<sup>®</sup> Designation, the individual must annually attest to being in compliance with the AIF<sup>®</sup> Designee Code of Ethics and accrue and report a minimum of twelve (12) hours of continuing education. The AIF<sup>®</sup> Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

# Certified Financial Planner<sup>™</sup> - CFP<sup>®</sup>

The CERTIFIED FINANCIAL PLANNER<sup>™</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the "CFP<sup>®</sup> marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP<sup>®</sup> certification is a voluntary

certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> certification. It is recognized in the United States and a number of other countries for its:

(1) high standard of professional education;

- (2) stringent code of conduct and standards of practice; and,
- (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP<sup>®</sup> marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). As part of earning the CFP certification, college or university level coursework through the CFP Board Registration Program must be completed. CFP\* professionals are well versed in these major personal financial planning areas: Professional Conduct and Regulation, General Principles of Financial Planning, Risk Management and Insurance Planning, Investment Planning, Tax Planning, Retirement Savings and Income Planning, Estate Planning, Psychology of Financial Planning, Financial Plan Development (Capstone Course).

**Examination** – Pass the comprehensive CFP<sup>®</sup> Certification Examination. The CFP<sup>®</sup> exam is a 170question, multiple-choice test that consists of two 3-hour sections during one day. Each section is divided into two distinct subsections. The exam includes stand-alone questions, as well as questions associated with case studies.

**Experience** – Complete at least two years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP<sup>®</sup> marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care. This means CFP<sup>®</sup> professionals must provide financial planning

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services in the best interests of their clients. CFP<sup>®</sup> professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP<sup>®</sup> certification.

#### **CMFC®-** Chartered Mutual Fund Counselor

CMFC<sup>®</sup> designee's obtain knowledge of mutual funds and their various uses as investment vehicles. The CMFC<sup>®</sup> is issued by the College for Financial Planning. While there are no pre-requisites for the CMFC<sup>®</sup> the designee is required to complete nine self-study modules complete with a final online, closed book, proctored exam. In addition, the designee is required to complete 16 hours of continuing education every two years.

#### **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

# The Financial Resource Center

Investment Advisor Representative 09/2021 – Present

#### Cambridge Investment Research Advisors, Inc.

Investment Advisor Representative & Registered Representation 03/2005 – 08/2021

# **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

# Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

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Mr. King is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, he will receive commissions for selling insurance and annuity products. Clients can choose any independent insurance agent and insurance company to purchase insurance products and are not obligated to purchase insurance products through Mr. King. Regardless of the insurance agent selected, the insurance agent or agency receives normal commissions from the sale. The receipt of compensation and other potential incentive benefits creates an incentive to recommend products to clients. At the time of any recommendations Mr. King will discuss the products, your needs and any compensation arrangements.

#### **Item 5 - Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mr. King does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through The Financial Resource Center.

#### Item 6 – Supervision

This section explains how The Financial Resource Center provides supervisory oversight.

The Financial Resource Center maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Mr. Evan T. Lane serves as the Chief Compliance Officer and is responsible for supervising all activities. Mr. Lane is also responsible for administering the policies and procedures and the system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements. Mr. Lane can be reached at (317) 871-8571 or <u>evan@tfrcinc.com</u>.



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9640 Commerce Drive, Suite 414 | Carmel, IN 46032 | (317) 871-8571

Form ADV Part 2B – Individual Disclosure Brochure

# Kerry S. Pennington CRD No. 2975051

640 Tete Lours Drive #10 | Mandeville, LA 70471 | (985) 630-1852

March 15, 2025

This brochure supplement provides information about your Investment Advisor Representative that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through The Financial Resource Center a registered investment advisor. Please contact The Financial Resource Center at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

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THE THE CENTER,

#### Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: Kerry S. Pennington Born: 1962

# Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

No University / College Level Education

# **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

# The Financial Resource Center

Investment Advisor Representative 04/2022 – Present

# Cambridge Investment Research Advisors, Inc.

Investment Advisor Representative & Registered Representation 05/2005 – 08/2022

# **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

# Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity

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pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

Ms. Pennington has no other financial industry business activities to disclose.

#### **Item 5 - Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mrs. Pennington does not receive any economic benefit from any person, company, or organization, in exchange for the advisory services providing to clients.

#### Item 6 – Supervision

This section explains how The Financial Resources Center provides supervisory oversight.

The Financial Resources Center maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Mr. Lane serves as the Chief Compliance Officer and is responsible for supervising all activities. Mr. Lane is responsible for administering the policies and procedures and the system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements. Mr. Lane can be reached at (317) 871-8571 or <u>evan@tfrcinc.com</u>.



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9640 Commerce Drive, Suite 414 | Carmel, IN 46032 | (317) 871-8571

# Form ADV Part 2B – Individual Disclosure Brochure

# Bryan E. Donaugh CRD No. 6434474

# March 15, 2025

This brochure supplement provides information about your Investment Advisor Representative that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through The Financial Resource Center a registered investment advisor. Please contact The Financial Resource Center at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

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# Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: Bryan E. Donaugh Born: 1983

# Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Indiana Wesleyan University - B.S. Christian Ministries (2006)

## **Professional Designations**

Mr. Donaugh has achieved the designations below. If you would like additional information you may discuss with him or visit the issuing entities website.

# Certified Financial Planner<sup>TM</sup> - CFP<sup>®</sup>

The CERTIFIED FINANCIAL PLANNER<sup>™</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the "CFP<sup>®</sup> marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> certification. It is recognized in the United States and a number of other countries for its:

- (1) high standard of professional education;
- (2) stringent code of conduct and standards of practice; and,
- (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP<sup>®</sup> marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). As part of earning the CFP certification, college or university level coursework through the CFP Board Registration Program must be completed. CFP<sup>®</sup> professionals are well versed in these major personal financial planning areas: Professional

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Conduct and Regulation, General Principles of Financial Planning, Risk Management and Insurance Planning, Investment Planning, Tax Planning, Retirement Savings and Income Planning, Estate Planning, Psychology of Financial Planning, Financial Plan Development (Capstone Course);

**Examination** – Pass the comprehensive CFP<sup>®</sup> Certification Examination. The CFP<sup>®</sup> exam is a 170question, multiple-choice test that consists of two 3-hour sections during one day. Each section is divided into two distinct subsections. The exam includes stand-alone questions, as well as questions associated with case studies;

**Experience** – Complete at least two years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP<sup>®</sup> marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and,

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care. This means CFP<sup>®</sup> professionals must provide financial planning services in the best interests of their clients. CFP<sup>®</sup> professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP<sup>®</sup> certification.

#### **Chartered Retirement Planning Counselor - CRPC**

Designation: Chartered Retirement Planning Counselor (CRPC). Issuing Organization: College for Financial Planning. Prerequisites/Experience Required: None. Educational Requirements: Online self-study CRPC course and exam to be completed within 120 days of receiving program access; instructor-led option based on availability. Continuing Education: 16 hours every 2 years.

#### **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

# The Financial Resource Center

Investment Advisor Representative

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THE FINANCIAL RESOURCE CENTER,

07/2024 - Present

**Transamerica Investors Securities Corporation** Registered Representative 11/2021 – 07/2024

**Transamerica Life Insurance Company** Retirement Plan Consultant 11/2021 – 07/2024

**CWM, LLC (DBA Carson Partners), Cetera Advisor Networks & Wealthcare Partners LLC** Registered Admin 09/2020 – 10/2021

**Valic Financial Advisors, Inc.** Registered Representative 02/2020 – 09/2020

Unemployed 01/2020 - 02/2020

# **Northview Church**

Groups & Team Director 04/2019 – 12/2019

#### **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

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#### **Insurance Agent**

Mr. Donaugh is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, she will receive commissions for selling insurance and annuity products. Clients can choose any independent insurance agent and insurance company to purchase insurance products and are not obligated to purchase insurance products through Mr. Donaugh. Regardless of the insurance agent selected, the insurance agent or agency receives normal commissions from the sale. The receipt of compensation and other potential incentive benefits creates an incentive to recommend products to clients. At the time of any recommendations Mr. Donaugh will discuss the products, your needs and any compensation arrangements.

#### **Item 5 - Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mr. Donaugh does not receive any economic benefit from any person, company, or organization, in exchange for the advisory services providing to clients.

#### Item 6 – Supervision

This section explains how The Financial Resources Center provides supervisory oversight.

The Financial Resources Center maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Mr. Lane serves as the Chief Compliance Officer and is responsible for supervising all activities. Mr. Lane is responsible for administering the policies and procedures and the system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements. Mr. Lane can be reached at (317) 871-8571 or <u>evan@tfrcinc.com</u>.



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#### **Privacy Policy**

#### **Our Commitment to You**

The Financial Resource Center is committed to safeguarding the use of personal information of our Client's (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy"). Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. The Financial Resource Center(also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. The firm does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

#### How We Gather Information.

We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)
- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)

Other sources with your consent (for example: your insurance professional, attorney, or accountant)

#### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

#### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

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#### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

#### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

#### How do we share your information?

The firm shares Client's personal information to effectlively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, consultants, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes The firm does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where The Financial Resource Center or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared

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Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> The firm does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

#### **Other Important Information**

## Information for California, North Dakota, and Vermont Customers

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

# Sharing Information with Other Companies Permitted Under Law.

We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist us with providing services to you. Unrelated third parties may include broker/dealers, unaffiliated third-party investment advisers, mutual fund companies, insurance companies, and the custodian with whom your assets are held. In such situations, we stress the confidential nature of information being shared.

# Former Customers.

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

# **Changes to our Privacy Policy**

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

#### **Any Ouestions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (317) 871-8571 or by email at <u>evan@tfrcinc.com</u>.



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