

# Life, Inc. Retirement Services Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Life, Inc. Retirement Services. If you have any questions about the contents of this brochure, please contact us at (614) 396-7652 or by email at [ryan.neff@lifeincrs.com](mailto:ryan.neff@lifeincrs.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Life, Inc. Retirement Services is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Life, Inc. Retirement Services's CRD number is: 173073.*

100 E. Campus View Blvd  
STE 250  
Columbus, OH 43235  
(614) 3961-7652  
[www.lifeincrs.com](http://www.lifeincrs.com)  
[ryan.neff@lifeincrs.com](mailto:ryan.neff@lifeincrs.com)

*Registration does not imply a certain level of skill or training.*

Version Date: 03/13/2024

## **Item 2: Material Changes**

There are no material changes in this brochure from the last annual updating amendment of Life, Inc. Retirement Services on 3/6/2023. Material changes relate to Life, Inc. Retirement Services policies, practices, or conflicts of interests only.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes .....	ii
Item 3: Table of Contents .....	iii
Item 4: Advisory Business .....	2
A. Description of the Advisory Firm .....	2
B. Types of Advisory Services .....	2
C. Client Tailored Services and Client Imposed Restrictions .....	3
D. Wrap Fee Programs .....	3
E. Assets Under Management .....	4
Item 5: Fees and Compensation .....	4
A. Fee Schedule .....	4
B. Payment of Fees .....	6
C. Client Responsibility For Third Party Fees .....	7
D. Prepayment of Fees .....	7
E. Outside Compensation For the Sale of Securities to Clients .....	7
Item 6: Performance-Based Fees and Side-By-Side Management .....	7
Item 7: Types of Clients .....	7
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	8
A. Methods of Analysis and Investment Strategies .....	8
B. Material Risks Involved .....	8
C. Risks of Specific Securities Utilized .....	9
Item 9: Disciplinary Information .....	10
A. Criminal or Civil Actions .....	10
B. Administrative Proceedings .....	10
C. Self-regulatory Organization (SRO) Proceedings .....	11
Item 10: Other Financial Industry Activities and Affiliations .....	11
A. Registration as a Broker/Dealer or Broker/Dealer Representative .....	11
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	11
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests .....	11
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	11
A. Code of Ethics .....	11
B. Recommendations Involving Material Financial Interests .....	12
C. Investing Personal Money in the Same Securities as Clients .....	12
D. Trading Securities At/Around the Same Time as Clients' Securities .....	12
Item 12: Brokerage Practices .....	12

A.	Factors Used to Select Custodians and/or Broker/Dealers.....	12
1.	Research and Other Soft-Dollar Benefits.....	13
2.	Brokerage for Client Referrals.....	13
3.	Clients Directing Which Broker/Dealer/Custodian to Use.....	13
B.	Aggregating (Block) Trading for Multiple Client Accounts.....	13
Item 13:	Reviews of Accounts.....	14
A.	Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	14
B.	Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	14
C.	Content and Frequency of Regular Reports Provided to Clients.....	14
Item 14:	Client Referrals and Other Compensation.....	14
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	14
B.	Compensation to Non – Advisory Personnel for Client Referrals.....	15
Item 15:	Custody.....	15
Item 16:	Investment Discretion.....	15
Item 17:	Voting Client Securities (Proxy Voting).....	15
Item 18:	Financial Information.....	15
A.	Balance Sheet.....	15
B.	Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	16
C.	Bankruptcy Petitions in Previous Ten Years.....	16
Item 19:	Requirements For State Registered Advisers.....	16
A.	Principal Executive Officers and Management Persons; Their Formal Education and Business Background.....	16
B.	Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any).....	16
C.	Calculation of Performance-Based Fees and Degree of Risk to Clients.....	16
D.	Material Disciplinary Disclosures for Management Persons of this Firm.....	16
E.	Material Relationships That Management Persons Have With Issuers of Securities (If Any).....	16

## Item 4: Advisory Business

As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our client’s interests first and must fully disclose any potential conflict of interest. We do not hold customer funds or securities.

### A. Description of the Advisory Firm

Life, Inc. Retirement Services (hereinafter “LIFEINCRS”) is a Corporation organized in the State of Ohio. The firm was formed in November 2014, and the principal owner is Ryan Russell Neff.

### B. Types of Advisory Services

#### *Portfolio Management Services*

LIFEINCRS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. LIFEINCRS creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

LIFEINCRS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. LIFEINCRS will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

LIFEINCRS seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of LIFEINCRS’s economic, investment or other financial interests. To meet its fiduciary obligations, LIFEINCRS attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, LIFEINCRS’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is LIFEINCRS’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

## ***Pension Consulting Services and 401(k) Services***

LIFEINCRS offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants. Additionally, LIFEINCRS may handle the Third Party Administration duties (which would not entail investment, tax or legal advice) for employee benefit plans. These services include plan design, investment and fund selection, third-party money manager selection, recordkeeping selection, 3(21) and 3(28) services, employee enrollment and education, and helps to overall manage the plan on the client's behalf for a smoother process for small businesses that sponsor these plans.

## ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/ credit planning.

## **Services Limited to Specific Types of Investments**

LIFEINCRS generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and non-U.S. securities. LIFEINCRS may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

LIFEINCRS offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent LIFEINCRS from properly servicing the client account, or if the restrictions would require LIFEINCRS to deviate from its standard suite of services, LIFEINCRS reserves the right to end the relationship.

## **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. LIFEINCRS does not participate in any wrap fee programs.

**E. Assets Under Management**

LIFEINCRS has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$13,721,000	\$63,159,000	December 2023

**Item 5: Fees and Compensation**

**A. Fee Schedule**

*Portfolio Management Fees*

Total Assets Under Management	Annual Fee
\$2,000,000 - AND UP	1.00%
\$1,000,000 - \$1,999,999	1.05%
\$500,000 - \$999,999	1.10%
\$0 - \$500,000	1.20%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the client contract. LIFEINCRS uses an average of the daily balance in the client’s account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty for a full refund of LIFEINCRS's fees within five business days of signing the client contract. Thereafter, clients may terminate the client contract generally with 30 days' written notice.

*Pension Consulting Services Fees*

**Asset-Based Fees for Pension Consulting**

Total Assets Under Management	Annual Fee
\$10,000,000 - AND UP	0.40%
\$9,000,000 - \$9,999,999	0.41%
\$8,000,000 - \$8,999,999	0.43%

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
\$7,000,000 - \$7,999,999	0.45%
\$6,000,000 - \$6,999,999	0.47%
\$5,000,000 - \$5,999,999	0.50%
\$4,000,000 - \$4,999,999	0.55%
\$3,000,000 - \$3,999,999	0.60%
\$2,500,000 - \$2,999,999	0.65%
\$2,000,000 - \$2,499,999	0.70%
\$1,500,000 - \$1,999,999	0.75%
\$1,000,000 - \$1,499,999	0.80%
\$500,000 - \$999,999	0.90%
\$0 - \$500,000	1.00%

LIFEINCRS uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the fee is based.

These fees are generally negotiable and the final fee schedule is attached as part of the client contract.

### **Fixed Fees for Pension Consulting**

The rate for creating client pension consulting plans is between \$2,500 and \$75,000. These fees are generally negotiable and the final fee schedule is attached as part of the client contract.



## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

### ***Payment of Asset-Based Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

### ***Payment of Fixed Pension Consulting Services Fees***

LIFEINCRS's fixed pension consulting fees, including Third Party Administration fees, are paid via check in arrears upon completion.

#### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by LIFEINCRS. Please see Item 12 of this brochure regarding broker-dealer/custodian.

#### **D. Prepayment of Fees**

LIFEINCRS collects its fees in arrears. It does not collect fees in advance.

#### **E. Outside Compensation For the Sale of Securities to Clients**

Neither LIFEINCRS nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

LIFEINCRS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **Item 7: Types of Clients**

LIFEINCRS generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Business Assets

There is no account minimum for any of LIFEINCRS's services.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

LIFEINCRS's methods of analysis include fundamental analysis, quantitative analysis and modern portfolio theory.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

#### *Investment Strategies*

LIFEINCRS uses long term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

#### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Quantitative Model Risk:** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Modern Portfolio Theory** assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one.

Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### *Investment Strategies*

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency. Investments can lose their value causing a loss to clients, including a complete loss of investments made. Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk. Economic risk exposure of an investment made in a foreign or domestic country due to changes in the business conditions or adverse effect of macroeconomic factors like government policies or collapse of the current government and significant swing in the exchange rates. Market risk is the risk of losses on financial investments caused by adverse price movements. Examples of market risk are: changes in equity prices or commodity prices, interest rate moves or foreign exchange fluctuations. Political risk is the risk an investment's returns could suffer as a result of political changes or instability in a country. Political risk is also known as "geopolitical risk," and becomes more of a factor as the time horizon of investment gets longer. They are considered a type of jurisdiction risk.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you 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.

**Equity** investment 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 environments.

**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.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real Estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither LIFEINCRS nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither LIFEINCRS nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither LIFEINCRS nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

LIFEINCRS does not utilize nor select third-party investment advisers. All assets are managed by LIFEINCRS management.

### **D. Advisor(s) are Licensed to Sell Insurance and Possible Conflicts of Interest**

LIFEINCRS has advisor(s) that are licensed to sell insurance. LIFEINCRS does not directly benefit from selling of these products and receives no compensation, but the representative(s) selling such products does receive compensation for selling these products, and could be alternative to other investments, including some with lower expenses.

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

### **A. Code of Ethics**

LIFEINCRS has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance,

Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. LIFEINCRS's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

LIFEINCRS does not recommend that clients buy or sell any security in which a related person to LIFEINCRS or LIFEINCRS has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of LIFEINCRS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of LIFEINCRS to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. LIFEINCRS will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of LIFEINCRS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of LIFEINCRS to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, LIFEINCRS will never engage in trading that operates to the client's disadvantage if representatives of LIFEINCRS buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

LIFEINCRS will require clients to use a specific broker-dealers to execute transactions. There is no conflict of interest, as the broker-dealer is not an affiliate or related person of LIFEINCRS. Not all advisers require their clients to direct brokerage. By directing brokerage, LIFEINCRS may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution.

Custodians/broker-dealers will be recommended based on LIFEINCRS's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and



also you may have an incentive to select or recommend a broker-dealer based on your interest in receiving the research or other products or services, rather than on your clients' interest in receiving most favorable execution." consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in LIFEINCRS's research efforts. LIFEINCRS will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian. LIFEINCRS will require clients to use Betterment, Interactive Brokers or SEI Investments Developments, Inc.

### ***1. Research and Other Soft-Dollar Benefits***

While LIFEINCRS has no formal soft dollars program in which soft dollars are used to pay for third party services, LIFEINCRS may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). LIFEINCRS may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and LIFEINCRS does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. LIFEINCRS benefits by not having to produce or pay for the research, products or services, and LIFEINCRS will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that LIFEINCRS's acceptance of soft dollar benefits may result in higher commissions charged to the client.

### ***2. Brokerage for Client Referrals***

LIFEINCRS receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

LIFEINCRS will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

LIFEINCRS does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for LIFEINCRS's advisory services provided on an ongoing basis (portfolio management and pension consulting) are reviewed at least quarterly by Ryan Russell Neff, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at LIFEINCRS are assigned to this reviewer.

All accounts for fixed fee advisory services (fixed fee pension consulting) are reviewed by Ryan Russell Neff, President, upon plan creation and delivery. This is only one level of review and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to fixed fee advisory services, LIFEINCRS's services will generally conclude upon delivery of the plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of LIFEINCRS's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

For accounts concerning fixed fee advisory services, each client will receive the plan upon completion.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

LIFEINCRS does not receive any economic benefit, directly or indirectly from any third party for advice rendered to LIFEINCRS's clients.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

LIFEINCRS does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

Client assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer (e.g., Interactive Brokers or SEI Investments Developments, Inc., Betterment, Orion Portfolio Solutions), mutual fund company, or transfer agent. Client assets are not held by LIFEINCRS or any associate of LIFEINCRS. Interactive Brokers or SEI Investments Developments, Inc., Betterment, Orion Portfolio Solutions acts as an introducing broker clearing on a fully-disclosed basis through. Interactive Brokers or SEI Investments Developments, Inc., Betterment, Orion Portfolio Solutions for LIFEINCRS.

When it deducts fees directly from client accounts at a selected custodian, LIFEINCRS will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

LIFEINCRS provides discretionary and non-discretionary investment advisory services to clients. The client contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, LIFEINCRS generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

### **Item 17: Voting Client Securities (Proxy Voting)**

LIFEINCRS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

LIFEINCRS neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

**B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither LIFEINCRS nor its management has any financial condition that is likely to reasonably impair LIFEINCRS's ability to meet contractual commitments to clients.

**C. Bankruptcy Petitions in Previous Ten Years**

LIFEINCRS has not been the subject of a bankruptcy petition in the last ten years.

**Item 19: Requirements For State Registered Advisers**

**A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

LIFEINCRS currently has only one management person: Ryan Russell Neff. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

**B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

**C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

LIFEINCRS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.

*This brochure supplement provides information about KURT STEVEN ALTRICHTER that supplements the Life, Inc. Retirement Services brochure. You should have received a copy of that brochure. Please contact KURT STEVEN ALTRICHTER if you did not receive Life, Inc. Retirement Services's brochure or if you have any questions about the contents of this supplement.*

*Additional information about KURT STEVEN ALTRICHTER is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Life, Inc. Retirement Services**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

**KURT STEVEN ALTRICHTER**

Personal CRD Number: 6025268

Investment Adviser Representative

78 10th St E

Unit #1203

Saint Paul, MN 55101

(651) 234-0051

[www.ivoryhill.com](http://www.ivoryhill.com)

[kurt.altrichter@ivoryhill.com](mailto:kurt.altrichter@ivoryhill.com)

UPDATED: 3/2/2022

## Item 2: Educational Background and Business Experience

**Name:** KURT STEVEN ALTRICHTER **Born:** 1992

### Educational Background and Professional

#### Education:

Bachelor of Arts, University of St. Thomas - 2014

Associates Degree, Army ROTC, University of Minnesota - 2014

#### Business Background:

11/2020 - Present	Fiduciary Advisor Ivory Hill/Life, Inc. Retirement Services
06/2019 - 10/2020	Fiduciary Advisor HERITAGE WEALTH ARCHITECTS, INC.
7/2012 - 6/2019	Financial Advisor HIGHMARK WEALTH MANAGEMENT LLC
1/2011 - 7/2012	Investment Associate UBS

## Item 3: Disciplinary Information

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**

KURT STEVEN ALTRICHTER is not licensed to sell insurance and does not outside of Life, Inc. Retirement Services.

#### **Item 5: Additional Compensation**

KURT STEVEN ALTRICHTER does not receive any economic benefit from any person, company, or organization, other than Life, Inc. Retirement Services in exchange for providing clients advisory services through Life, Inc. Retirement Services.

#### **Item 6: Supervision**

As the Fiduciary Advisor, KURT STEVEN ALTRICHTER reports to Chief Compliance Officer of Life, Inc. Retirement Services, Ryan Russell Neff supervises all duties and activities of the firm. Ryan Russell Neff's contact information is on the cover page of this disclosure document. KURT STEVEN ALTRICHTER adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements For State Registered Advisers

*This disclosure is required by Ohio state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

A. KURT STEVEN ALTRICHTER has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - a) an investment or an investment-related business or activity;
  - b) fraud, false statement(s), or omissions;
  - c) theft, embezzlement, or other wrongful taking of property;
  - d) bribery, forgery, counterfeiting, or extortion; or
  - e) dishonest, unfair, or unethical practices.
  
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) an investment or an investment-related business or activity;
  - b) fraud, false statement(s), or omissions;
  - c) theft, embezzlement, or other wrongful taking of property;
  - d) bribery, forgery, counterfeiting, or extortion; or
  - e) dishonest, unfair, or unethical practices.

B. KURT STEVEN ALTRICHTER has NOT been the subject of a bankruptcy petition.