

Educating Clients About Our Business Relationships: Good Financial Group, LLC and ValMark Financial Group, LLC

INDEPENDENT CONTRACTOR RELATIONSHIP WITH VALMARK COMPANIES

I am Julian H. Good, Jr., CLU, ChFC. I own Good Financial Group, LLC (“GFG”), an independent financial advisory firm affiliated with ValMark Financial Group, LLC (referred collectively with its subsidiaries as “ValMark”). I believe in a holistic planning approach when working with clients. I have affiliated with ValMark because they approach business similarly, and they provide access to a variety of financial products and services to help my clients achieve their financial goals. While I have chosen to affiliate with ValMark, I am not an employee, or otherwise controlled by ValMark. As an independent business, I pay all my business overhead expenses, including staffing, rent & employee benefits. Based upon the services or products I recommend, I, along with ValMark, can fulfill your wealth and risk management needs in one or more of my individual capacities: Investment Adviser Representative (advisory services), Registered Representative (brokerage services) or Agent (insurance services). Each of these roles imposes different legal duties and specific regulatory requirements. The goal of these disclosures is to describe the various roles in which I may serve, and each role’s attendant duties and requirements. Additionally, I hold professional designations which require that I shall make every conscientious effort to render that service, which, in the same circumstances, I would apply to myself.

I am affiliated with ValMark, in the following ways:

- As an Investment Advisor Representative serving as investment advice fiduciaries by offering investment advice through ValMark Advisers, Inc. (VAI), an investment advisor registered with the U.S. Securities and Exchange Commission (SEC).
- As a Registered Representative of ValMark Securities, Inc. (VSI), a national, introducing broker-dealer, registered with the Financial Industry Regulatory Authority (FINRA). When selling variable life insurance and annuity products, these products are sold through the broker-dealer.
- As an Insurance Agent, I am contracted through Executive Insurance Agency, Inc. (EIA), a ValMark affiliated company, to provide general account life insurance and certain fixed annuity products through multiple insurance companies that are regulated by state insurance departments.

It is important to understand that investment advisory, brokerage and insurance services are separate and distinct services each governed by different laws, legal standards, and separate contracts with you. While there may be similarities, depending on the capacity in which I act, the contractual relationship and legal duties owed to you are subject to several important differences. I encourage you to read this information carefully and discuss it with me if you have any questions.

QUALIFIED ACCOUNTS

When I, and any of the ValMark-related entities through which I can offer advisory, investment or insurance products or services to you, provide advice regarding moving your retirement assets, whether maintained in a retirement plan such as a 401(K), an Individual Retirement Account or similar retirement vehicle (Qualified Assets), from one type of Qualified Asset account to another, I will be acting as a fiduciary under Department of Labor

(DOL) mandated standards. This is true regardless of the role or product offering. The DOL fiduciary standard includes:

- Ensuring recommendations made to you are in your best interest, using the same skill, prudence and diligence as a “Prudent Person” would in similar circumstances;
- Ensuring that only reasonable compensation is charged to you; and
- Ensuring no materially misleading statements are made at the time of the recommendation.

ADVISORY SERVICES

I am an Investment Advisor Representative of VAI. When serving in this capacity, VAI and I are investment advice fiduciaries under the Securities and Exchange (SEC) standard. Through this affiliation, I can offer many investment advisory programs. These services may include limited discretionary investment advisory programs and advice on the selection of investment managers and mutual funds offered through VAI’s investment advisory programs.

When VAI acts as your investment advisor, and I act as your Investment Advisor Representative, I will enter into a written agreement with you expressly acknowledging the fiduciary advisory relationship and describing the obligations I owe you. I will supply you with VAI’s Form ADV Part 2A or Part 2A Appendix and Part 2B brochures that provide detailed information about, among other things, the advisory services provided, fees for those services, code of ethics, other business activities, financial industry affiliations and any conflicts between VAI and our interests and your interests, at the beginning of the advisory relationship. VAI’s Form ADV, along with other important disclosures you should read, can be found at: <http://www.valmarkfg.com/site/resources-section/company-disclosures/>. During the advisory relationship, your money is not directly held at ValMark but is instead, custodied at a firm selected by you. You may choose to have your funds held at Charles Schwab, TD Ameritrade or Pershing LLC.

CHARGES FOR INVESTMENT ADVISORY SERVICES:

For asset management accounts, you will be charged a fee. This fee may vary based on a percentage of your advisory assets and services provided, which will be subtracted from your account quarterly. I receive a portion of the fee you pay, with a portion retained by VAI.

FIDUCIARY ROLE & RESPONSIBILITIES AS AN INVESTMENT ADVISOR:

When VAI acts as your registered investment advisor and I act as an Investment Advisor Representative, I am held to legal standards under the Investment Advisers Act of 1940 and state laws, where applicable, which reflect the high standard of a fiduciary. This standard includes:

- Obligations to disclose to you all material conflicts between my interests and your interests.
- If I, or an affiliate, receive additional compensation from you or a third-party because of my relationship with you, I must disclose that to you.
- I must obtain your informed consent before I can act in an investment advisory capacity.
- I must treat advisory clients fairly and equitably and cannot unfairly advantage one client to the disadvantage of another.
- The investment decisions or recommendations I make

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must be suitable and appropriate for you, and consistent with your investment objectives and goals, and any restrictions you have placed on us.

- I must act in what I reasonably believe to be your best interest and in the event of a conflict of interests, I must place your interest before my own.

BROKERAGE SERVICES

As an introducing broker-dealer, VSI can take your securities orders and execute transactions directly through an insurance or mutual fund company, or through its clearing firm, Pershing LLC. Any recommendation of securities in my capacity as a Registered Representative of VSI is part of the brokerage services and no separate fee is charged for this advice. In accordance with FINRA rules, recommendations must be suitable for you in light of your particular financial circumstances, goals and tolerance for risk. The advice and service I provide to you with respect to brokerage accounts are an integral part of services offered as a broker-dealer. When serving in this capacity, the insurance company, mutual fund, investment company and/or clearing firm pays VSI a commission, most of which is paid to me as a Registered Representative.

VARIABLE LIFE AND ANNUITY PRODUCTS:

Some insurance products are dually regulated; by individual state insurance commissioners and by FINRA. These products are filed with the SEC through a prospectus. The prospectus contains information on costs and risks associated with the investment. This is because they offer clients investment choices in sub-accounts that contain securities. When recommending these products to you, I am acting as a Registered Representative of a broker-dealer, VSI. Compensation is in the form of commissions, overrides and bonuses similar to general account life insurance products and may vary based on the product recommended. These transactions are supervised by VSI and must be deemed suitable for you, based on information provided by you.

CHARGES AND POSSIBLE CONFLICTS:

If you choose to establish a brokerage account with VSI using me as Registered Representative, you will pay a commission for brokerage services each time a transaction is executed for your account. This commission is negotiable and will be disclosed in every confirmation statement. In the case of mutual funds, group annuities, variable life insurance and annuities, VSI will be paid a commission from the issuer of the security. VSI pays a large portion of commissions to me as a Registered Representative of the broker-dealer. When acting as a Registered Representative of VSI, I am under no obligation to recommend any specific company's products. I have, however, agreed to minimum production requirements, in aggregate, to maintain a relationship with VSI and the firm's buying group. As my production increases, I may receive an increasing percentage of the amount of commissions paid to VSI. Further details about specific brokerage service pricing and special compensation arrangements may be found on the above referenced ValMark disclosure webpage.

ROLE & RESPONSIBILITY AS A BROKER-DEALER:

When VSI acts as your broker for securities transactions, with me as its Registered Representative, I am held to the legal standards of the Securities Exchange Act of 1934, the Securities Act of 1933, the rules of self-regulatory organizations, such as FINRA, and

state laws where applicable. As a broker-dealer and Registered Representative, VSI and I, respectively, have a duty to deal fairly with you. Consistent with the duty of fairness, is an obligation to make sure prices you receive when executing transactions are reasonable and fair considering prevailing market conditions. I must have a reasonable basis for believing any securities recommendations made to you are suitable and appropriate for you, given your individual financial circumstances, needs and goals. It is important to note when acting as your broker-dealer and Registered Representative, respectively, I do not enter into an investment advice fiduciary relationship with you when recommending investment transactions, as I would when providing you investment advisory services. My legal obligations to disclose detailed information to you about the nature and scope of my businesses, fees, and conflicts between my interests and yours are more limited than when I owe you fiduciary duties.

INSURANCE SERVICES

EIA and I are each licensed with certain state departments of insurance as life, accident & health agents and appointed with several insurance companies to offer you a wide variety of insurance products such as life insurance, disability insurance, long-term care insurance, annuity products and group insurance. When serving as an insurance agent, my compensation is exclusively in the form of commissions, overrides and bonuses paid to us directly or through EIA. I am under no obligation to use any specific company's products but I have agreed to minimum production requirements, in aggregate, to maintain a relationship with EIA's buying group. While compensation is similar among products of various companies, it does differ between products and I may make more on some products than others.

INSURANCE AND BROKERAGE SERVICES INDIRECT COMPENSATION DISCLOSURES

EIA and VSI have certain companies with which they have selling agreements. It is these companies' products, expertise and services to which I have access. EIA and VSI also have buying leverage with these carriers for their respective clients. Because of direct contracts and a large volume of business between these select insurance companies, there may be higher compensation than with insurance companies where there is little volume or carriers that choose to also pay a wholesaler or an insurance company general agent. Select carriers may subsidize software, training, meetings, trips, and other benefits, but the value of these items in no case exceeds 5% of EIA and VSI's combined total compensation.

FOR MORE INFORMATION

Understanding the ways in which ValMark and I can conduct business is vital to my relationship with you. It is part of my ethical duty as a professional to disclose this information to you. The investment advisory programs, brokerage accounts and insurance ValMark and I offer you differ in other ways than those summarized above. Therefore, it is important you carefully read all agreements and disclosures provided to you regarding the products or services under consideration. ValMark and I strive to make sure the nature of our services is clear in materials I publish. If, at any time you would like further clarification on the nature of your accounts or the services you receive, you are strongly encouraged to contact either myself or ValMark.