

# ILG Private Wealth, Inc. Disclosure Brochure

*This Brochure provides information about the qualifications and business practices of ILG Private Wealth, Inc. If you have any questions about the contents of this brochure, please contact us at (724) 228-9910 or by email at: [john@ILG.Com](mailto:john@ILG.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. Our website can be found at [www.ILG.com](http://www.ILG.com).*

*Additional information about ILG Private Wealth, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). ILG Private Wealth, Inc.'s CRD number is: 292267.*

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

March, 2026

## **Item 2: Material Changes**

There have been no material changes since the date of our last Disclosure Brochure.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

ILG Private Wealth, Inc. (“ILG”) is a corporation organized under the laws of the Commonwealth of Pennsylvania. The firm was formed in January of 2018, and the principal owner is John H. Iannucci.

### B. Types of Advisory Services

#### *Portfolio Management Services*

ILG directs clients to third-party investment advisers (“Managers”) to manage all or a portion of the client’s assets. Before selecting the Managers for clients, ILG will always ensure the Managers are properly registered as an investment adviser (or ensure that the Manager is exempt from such registration). ILG conducts due diligence on each Manager, which may involve one or more of the following: phone calls, meetings and review of the Manager’s regulatory disclosures, financial documents and investment performance and strategy. ILG then makes investments with a Manager by allocating a portion of the client’s assets to the Manager. ILG will review the ongoing performance of the Manager to ensure that the strategy utilized by such Manager continues to be appropriate for the client’s portfolio.

To further assist in its due diligence process, ILG utilizes a team of professionals to review and vet a list of qualified Managers. These due diligence experts utilize a disciplined approach of investment research. Beyond using a readily available database, the due diligence professionals have knowledge, experience and personal relationships with key individuals associated with such Managers. By considering over 850 available Managers, ILG looks for Managers that offer innovative solutions and who accommodate ILG’s need for transparency and disciplined processes.

The due diligence team regularly uses a six-step review process that includes visits to the investment advisors’ offices. The due diligence team presents its results and recommendations to the President of ILG, who then reviews and analyzes such information before selecting such advisor as a Manager that is recommended by ILG. Once added to the list of available Managers, the due diligence team continues to evaluate the performance and consistent management strategy of the Managers with quarterly and annual reviews. On a regular basis, a Manager is closely monitored when strategies exhibit unexpected or unexplained performance results. Likewise, the change in key personnel or a shift in investment process or philosophy may cause a Manager to be placed on a watch list. Finally, when ongoing performance prompts questions about the effectiveness of an investment philosophy, a Manager may be removed from ILG’s list of possible managers.

## *IRA Rollover Recommendations*

ILG may provide investment advice and recommendations to clients regarding any rollovers to or from a retirement plan account or individual retirement account. When providing such advice, ILG is deemed to be a fiduciary under applicable federal law. The manner in which it is compensated may create a conflict of interest, so ILG operates under a special rule that requires it to act in a client's best interest and not put its interest ahead of the client. Under this rule, ILG must:

- Meet a professional standard of care when making investment recommendations;
- Never put its financial interests ahead of a client when making recommendations;
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that it gives advice that is in the client's best interest;
- Charge no more than is reasonable for its services; and
- Give the client basic information about conflicts of interest.

ILG may benefit financially from the rollover of client assets from a retirement plan or account to an account that it manages because the assets increase its assets under management and, in turn, the advisory fees earned by ILG. As a fiduciary, ILG can only recommend a rollover when it believes it is in the client's best interest.

With respect to any such retirement plan or account in which a client has sole authority to direct the investments, such client acknowledges and understands that the investment discretion of ILG will be limited to the investment alternatives provided by the retirement plan or account and that ILG will have no duty, responsibility, or liability for plan or account assets that are not included in the account. Client also understands that ILG may only accept a client's password and/or log-in information for any retirement plan or account when such information does not permit access to the assets of the account, including the ability to transfer funds out of the account, the ability to request a loan or withdrawal, or to change the address of record on the account. Client further acknowledges that ILG will not receive any communication from the plan sponsor or custodian, and it shall remain the exclusive obligation of the client to notify ILG of any changes or restrictions pertaining to the client's retirement plan or account.

## *Pension Consulting Services*

ILG offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions;
- providing guidance on various assets classes and investment options;
- recommending money managers to manage plan assets in ways designed to achieve investment objectives;
- monitoring performance of money managers and investment options and making recommendations for changes;
- recommending other service providers, such as custodians and third-party administrators and
- creating a written pension consulting plan.

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

### ***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***

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

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

ILG will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by ILG on behalf of the client through its Managers. The Managers may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent the Manager from properly servicing the client account, or if the restrictions would require the Manager to deviate from its standard suite of services, ILG reserves the right to end the relationship.

In addition to risk tolerance, we assist clients in determining their investment objectives and goals and investment time horizons.

## **D. Wrap Fee Programs**

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

## **E. Assets Under Management**

ILG has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$82,657,221	\$0	February, 2026

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

Total Assets Under Management	Maximum Annual Fees
All Assets	2.75%

Lower fees for comparable services may be available from other sources.

#### *Advisory Fee*

Depending upon the Manager, the advisory fee is either billed quarterly in advance, based on the value of the assets in the Account on the last business day of the prior quarter, or billed monthly in arrears and is based upon a percentage of the average daily balance of the assets in the Account during the month.. These fees are generally negotiable, and the final fee schedule is attached as an Exhibit to the Investment Advisory Contract. The fee paid to ILG will be in addition to the fee charged by and paid to the Managers. Clients may terminate the agreement without penalty for a full refund of ILG's fees within five business days of signing the pertinent documents. Thereafter, clients may terminate the agreement immediately upon delivery of written notice to ILG. Upon termination, all unearned fees will be prorated, based on the number of days, and reimbursed to the client.

#### *Managers' Fees*

Managers' fees will be set forth in the contract between ILG and each Manager. The fees charged by and paid to the Managers will be in addition to the fee paid to ILG. The total fees will not exceed any limit imposed by any regulatory agency.

#### *Pension Consulting Services Fees*

#### **Asset-Based Fees for Pension Consulting**

Total Assets Under Management	Maximum Annual Fee
All Assets	2.75%

Depending upon the specific arrangement, ILG bills quarterly in advance, based on the value of the assets on the last business day of the prior quarter, or bills monthly in arrears, based upon a percentage of the average daily balance of the assets in the Account during the month. These fees are generally negotiable, and the final fee schedule

is attached as an Exhibit to the pension consulting agreement.

Clients may terminate the agreement without penalty for a full refund of ILG's fees within five business days of signing the pension consulting agreement. Thereafter, clients may terminate the pension consulting agreement immediately upon delivery of written notice to ILG. Upon termination, all unearned fees will be prorated, based on the number of days in the quarter, and reimbursed to the client.

### **Fixed Fees**

The rate for creating client pension consulting plans is between \$2,500 and \$25,000. The final fee schedule will be attached as an Exhibit to the pension consulting agreement. This service may be canceled immediately upon written notice.

### **Hourly Fees**

The hourly fee for these services is between \$300 and \$500, or as otherwise negotiated. The final fee schedule will be attached as an Exhibit to the pension consulting agreement. Upon termination of the agreement, all fees earned as of the date of termination will be due and payable.

### ***Financial Planning Fees***

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$2,500 and \$25,000.

#### **Hourly Fees**

The negotiated hourly fee for these services is between \$150 and \$500, or as otherwise negotiated.

Clients may terminate the agreement without penalty, for full refund of ILG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Upon termination, all unearned fees will be prorated, based on the number of days in the quarter, and reimbursed to the client.

## **B. Payment of Fees**

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

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization, or may be invoiced and billed directly to the client, depending upon the relationship established with ILG.

For fees deducted directly from client accounts, ILG will:

- (A) possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee
- (D) and the amount of assets under management on which the fee was based.

### ***Payment of Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization quarterly in advance.

Fixed pension consulting fees are paid directly by the client. These fees are paid in accordance with the pension consulting agreement, but never more than six months in advance, with the remainder due upon presentation of the written plan.

Hourly pension consulting fees are paid 25% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

### ***Payment of Selection of Other Advisers Fees***

The timing, frequency, and method of paying the fees of the Managers will depend on the specific third-party adviser selected.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid directly by the client.

Fixed financial planning fees are paid 25% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Hourly financial planning fees are paid 25% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

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

Clients are responsible for the payment of all third-party fees (*i.e.*, Managers' fees, custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by ILG.

## **D. Prepayment of Fees**

ILG generally collects its recurring fees quarterly in advance. Refunds for unearned fees paid

in advance will be returned within fourteen days to the client via check, or as a credit to the client's account.

For all asset-based fees paid in advance, the unearned portion of the fee to be refunded will be based upon the number of days remaining in the quarter following the date of termination.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the refunded fee will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

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

Neither ILG nor its supervised persons accept any compensation for the sale of 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**

ILG 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**

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit-Sharing Plans

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

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

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

ILG utilizes the Managers to manage Client's accounts. The Managers may use various methods of analysis including Charting analysis, Cyclical analysis, Fundamental analysis,

Modern portfolio theory, Quantitative analysis and Technical analysis. While ILG may consult with the Managers regarding individual methods of analysis, ILG does not perform such analysis internally or monitor the daily trading activity of the Managers.

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

## **B. Material Risks Involved**

**Selection of Other Advisers:** Although ILG will seek to select only those Managers who will invest clients' assets with the highest level of integrity, ILG's selection process cannot ensure that Managers will perform as desired and ILG will have no control over the day-to-day operations of any of its selected Managers. ILG would not necessarily be aware on a timely basis of certain activities at the underlying Managers, including without limitation, a Manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**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 (except for Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds, whether fixed income or equity, 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. .

**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 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) 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.

**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 ILG 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 ILG 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**

Certain investment adviser representatives of ILG are licensed insurance agents with various life insurance companies directly, through a producer's group or an insurance marketing organization. From time to time, they will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. ILG always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to purchase and implement any insurance products through any representative of ILG in their capacity as a licensed insurance agent.

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

ILG will direct clients to the Managers to manage all or a portion of the client's assets. Clients will pay ILG its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between ILG and each third-party advisor. ILG will always act in the best interests

of the client, including when determining which Manager to recommend to clients. ILG will ensure that all Managers are licensed in the states in which ILG is recommending them to clients.

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

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

ILG 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. ILG's Code of Ethics is available free upon request to any client or prospective client.

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

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

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

From time to time, representatives of ILG may personally utilize the Managers utilized by ILG to manage client assets.

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

From time to time, representatives of ILG may utilize the same Managers for themselves at or around the same time as clients. This does not, however, present a conflict of interest, as ILG does not have any control or influence over the trading decisions made by such Managers.

## **Item 12: Brokerage Practices**

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

Custodians will be recommended based on ILG'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 fees, and ILG may also consider the market expertise and research access provided by the custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the custodians that may

aid in ILG's research efforts.

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

While ILG has no formal program in which soft dollars are used to pay for third party services, credits are occasionally made available by third-party vendors for specific client marketing events.

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

ILG 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***

ILG and the Managers will require clients to use a specific custodian to execute transactions.

## **Item 13: Review of Accounts**

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

All client accounts are reviewed at least annually by ILG with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by John H Iannucci, President. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **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 financial plans, ILG's services will generally conclude upon delivery of the financial plan.

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

Each client of ILG'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. Each financial planning client will receive the financial 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)**

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

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

ILG does not directly or indirectly compensate any person who is not an investment advisory representative of ILG for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts by the account custodian, ILG 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**

ILG provides discretionary investment advisory services to clients by selecting and/or substituting the Managers utilized in connection with client accounts. The advisory contract established with each client sets forth the conditions regarding the use of Managers by ILG. The Managers selected by ILG generally manage the client's account and makes investment decisions without consultation with the client or ILG 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. In some instances, the discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to ILG).

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

ILG 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**

ILG neither requires nor solicits prepayment of more than \$1200 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 ILG nor its management has any financial condition that is likely to reasonably impair ILG's ability to meet contractual commitments to clients.

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

ILG 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**

ILG currently has only one management person: John H. Iannucci. Education and business background can be found on Mr. Iannucci'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 investment advisory representative of ILG can be found in the Form ADV Part 2B brochure supplement for each such individual.

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

ILG 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.