



Part 2B of Form ADV: *Brochure Supplement*

Neeta Balani
Melissa Banaszak
Stephen Curtis Coombs
Marc J. Eichberg
Kenneth G. Ingham
Jennifer Ingham-Shelley
Todd J. Levy
Heidi Lee Miller
Marlon Suarez

Ingham Retirement Group
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Miami, Florida 33156
305-671-2200

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This brochure supplement provides information about the individuals listed above that supplements the Ingham Retirement Group brochure. You should have received a copy of that brochure. Please contact Andrew R. Newman 305-671-2200 if you did not receive Ingham Retirement Group's brochure or if you have any questions about the contents of this supplement.

Additional information about the individual(s) listed above is available on the SEC's website at www.adviserinfo.sec.gov

Neeta Balani, Miami, FL

Item 2 Educational Background and Business Experience

Full Legal Name: Neeta Balani **Born:** 1978

Education

- Ness Wadia College of Commerce; Bachelor of Business Administration; 1998
- Symbiosis Institute of Management; Post Graduate Diploma in Public Relations; 1999
- University of Pune; Master of Business Administration; 2002

Business Experience

- Northern Trust (Assignment through Brickell Personnel); Investment Associate; from 2006 to 2007
- 1st Discount Brokerage, Inc.; Portfolio Analyst; from 2008 to 2010
- US Trust, Bank of America; Portfolio Manager Associate; from 2010 to 2011
- Sun Creek Holdings, LLC; Financial Advisor; from 2015 to 2019
- Ingham Retirement Group, Senior Analyst/ Investment Advisor Rep.; 2019 to Present

Designations

Neeta Balani has earned the following designation(s) and is in good standing with the granting authority:

- Chartered Financial Analyst®; CFA Institute; 2009

This designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA® charter, candidates must successfully complete three exams and gain at least three (3) years of qualifying work experience, among other requirements. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

Item 3 Disciplinary Information

Neeta Balani has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Neeta Balani is not engaged in any other investment-related activities.
2. Neeta Balani does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

Neeta Balani is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

Item 5 Additional Compensation

Neeta Balani does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA, Chief Investment Officer

Phone Number: (305) 671-2200

Todd J. Levy and other individuals as designated regularly review the accounts for which Ms. Neeta Balani provides Investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Melissa Banaszak, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Emmanuelle Melissa Banaszak **Born:** 1985

Education

- University of Miami; BBA, International Finance & Marketing, English, Cum Laude; 2006

Business Experience

- Ingham Retirement Group; Investment Analyst; from 2007 to Present

Item 3: Disciplinary Information

Ms. Banaszak has no reportable disciplinary history.

Item 4: Other Business Activities

Ms. Banaszak, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest nor does Ms. Banaszak earn any additional compensation from these clients for providing these services.

Item 5: Additional Compensation

Ms. Banaszak does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA, Chief Investment Officer

Phone Number: (305) 671-2200

Todd J. Levy and other individuals as designated regularly review the accounts for which Ms. Banaszak provides Investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Stephen Coombs, Miami, FL

Item 2 Educational Background and Business Experience

Full Legal Name: Stephen Curtis Coombs **Born:** 1971

Education

- University of Memphis, TN; B.S. in Business, Accounting; 1993
- Evangelical Christian School, Cordova, TN; 1989

Business Experience

- Ingham Retirement Group, Senior Pension Administrator Rep.; July 2019 to Present
- Brewster & Brewster, Inc.; Senior Administrator/Consultant; Nov. 2015 to April 2017
- Plan Administration & Consulting, LLC; Director of Plan Administration; June 1995 to Nov. 2015
- First Mercantile/Member of Massmutual; Director of Plan Administration; from June 1995 to Nov. 2015
- Morgan Keegan; Fixed Income Research Analyst; from January 1994 to June 1995

Designations

Stephen Coombs has earned the following designations and is in good standing with the granting authority:

- QKA; ASSPA, Arlington, VA; 2006

The QKA credential is the national standard for all professionals working with 401(k) retirement plans. Attaining the QKA credential illustrates commitment to the profession and competence in DC plan administration.

- QPA; ASSPA, Arlington, VA; 2009

The Qualified Pension Administrator (QPA) credential was created by ASPPA to recognize professionals who are qualified to perform the technical and administrative functions of qualified plan administration. QPAs assist employers, actuaries, and consultants in performing functions such as determination of eligibility benefits, computation of benefits, plan recordkeeping, trust accounting and disclosure, and compliance requirements.

- CPC; ASPPA, Arlington, VA; 2017

The Certified Pension Consultant (CPC) credential is conferred by ASPPA to benefits professionals working in plan administration, pension actuarial administration, insurance and financial planning. CPCs work alongside employers to formulate, implement, administer and maintain qualified retirement plans. The CPC is the capstone credential, or highest credential, currently conferred by ASPPA.

Item 3 Disciplinary Information

Mr. Coombs has no reportable disciplinary history.

Item 4 Other Business Activities

Mr. Coombs, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest nor does Mr. Coombs earn any additional compensation from these clients for providing these services.

Item 5 Additional Compensation

Mr. Coombs does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Kenneth G. Ingham

Title: President & CEO

Phone Number: (305) 671-2200

Kenneth G. Ingham and other individuals as designated regularly review the accounts for which Mr. Coombs provides investment advisory services to monitor suitability or recommendations and compliance with regulatory and internal procedures. In addition, Mr. Ingham directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Marc J. Eichberg, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Marc J. Eichberg **Born:** 1957

Education

- University of Miami; BBA, Accounting; 1979

Business Experience

- Ingham Retirement Group; Principal & Pension Consultant; from 1991 to Present

Designation

Marc J. Eichberg has earned the following designation(s) and is in good standing with the granting authority:

- CPA; Florida Institute of Certified Public Accountants; 1981

This designation is offered by the Florida Division of Certified Public Accounting. To obtain the CPA designation candidates must pass all four parts of the CPA Examination and have one year work experience under the supervision of a licensed CPA. Candidates must complete 150 credit hours with at least 36 hours in several core accounting areas.

- CPA; American Institute of Certified Public Accountants; 1982

Item 3: Disciplinary Information

Mr. Eichberg has no reportable disciplinary history.

Item 4: Other Business Activities

Certain investment products may pay commissions to registered representatives. While receiving commissions might provide an incentive to recommend products based on the compensation received, rather than on the client's needs, Ingham Retirement Group avoids any conflict by reducing or offsetting asset based fees charged to the Client. Mr. Eichberg, as a shareholder in Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. Mr. Eichberg sometimes earns additional compensation from Ingham Retirement Group in connection with providing these services to Clients.

Item 5: Additional Compensation

Mr. Eichberg does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Kenneth G. Ingham

Title: President & CEO

Phone Number: (305) 671-2200

Kenneth G. Ingham and other individuals as designated regularly review the accounts for which Mr. Eichberg provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Ingham directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Kenneth G. Ingham, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Kenneth G. Ingham **Born:** 1948

Education

- University of Miami; BBA, Business Administration; 1971

Business Experience

- Ingham Retirement Group; President & CEO; from 1990 to Present

Designations

Kenneth G. Ingham has earned the following designations and is in good standing with the granting authority:

- Enrolled Actuary; Joint Board for the Enrollment of Actuaries; 1976

An Enrolled Actuary is any individual who has satisfied the standards and qualifications as set forth in the regulations of the Joint Board for the Enrollment of Actuaries as, amended, and who has been approved by the Joint Board to perform actuarial services required under the Employee Retirement Income Security Act of 1974 (ERISA).

- MSPA; Member of the American Society of Pension Actuaries; 1976

Applicants successfully completing the three examinations required for Enrolled Actuary status [A-1 (EA-1), A-2 (EA-2A) and A-3 (EA-2B)] with at least three years retirement plan related experience may apply for the MSPA credential.

- M.A.A.A.; Member of the American Academy of Actuaries; 1979

Must be a member in one or more of the following: Associateship in the Casualty Actuarial Society, associateship in the Society of Actuaries, M.S.P.A. or F.S.P.A. in the American Society of Pension Professionals and Actuaries, membership in the Conference of Consulting Actuaries or enrolled actuary status under Title 3, Section C of the Employee Retirement Income Security Act of 1974.

- AIFA-Accredited Investment Fiduciary Analyst; Center for Fiduciary Studies, University of Pittsburgh - 2006

This designation is offered by the Center for Fiduciary Studies. To obtain the AIFA Designation, candidates must successfully attain the AIF designation which consists of one exam and a three day intensive classroom program, complete a case study and pass an

additional exam. In passing these exams, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.

Item 3: Disciplinary Information

Kenneth G. Ingham has no reportable disciplinary history.

Item 4: Other Business Activities

Mr. Ingham receives commissions, bonuses or other compensation on the sale of securities or other investment products. Certain investment products pay commissions to Registered Representatives. While receiving commissions might provide an incentive to recommend products based on the compensation received, rather than on the client's needs, Ingham Retirement Group avoids any conflict by reducing or offsetting asset based fees charged to the Client. Mr. Ingham, as a shareholder in Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. Mr. Ingham sometimes earns additional compensation from Ingham Retirement Group in connection with providing these services to clients.

Item 5: Additional Compensation

Kenneth G. Ingham does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

As President and Chief Executive Officer, Kenneth G. Ingham reports to the Board of Directors and is responsible for supervision of all employees of the firm. He may be reached at (305) 671-2200.

Jennifer Ingham-Shelley, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Jennifer Ingham-Shelley **Born:** 1975

Education

- University of Virginia; 1994 -1996
- University of Miami; BA, Entrepreneurship, minor in Management & Marketing; 1996 -1998

Business Experience

- Ingham Retirement Group; Client Relationship Manager; from 03/2009 to Present
- Ingham Group; Marketing Coordinator, from 04/2002 to 03/2005

Designations

- AIF; Center for Fiduciary Studies, University of Pittsburgh; 2010

This designation is offered by the Center for Fiduciary Studies. To obtain the AIF Designation, candidates must successfully complete one difficult exam and a two day intensive classroom program. In passing this exam, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.

Item 3: Disciplinary Information

Ms. Ingham-Shelley has no reportable disciplinary history.

Item 4: Other Business Activities

Ms. Ingham-Shelley, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest nor does Ms. Ingham-Shelley earn any additional compensation from these clients for providing these services.

Item 5: Additional Compensation

Ms. Ingham-Shelley does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Kenneth G. Ingham

Title: President & CEO

Phone Number: (305) 671-2200

Kenneth G. Ingham and other individuals as designated regularly review the accounts for which Ms. Ingham-Shelley provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Ingham directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Todd J. Levy, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Todd J. Levy **Born:** 1974

Education

- Syracuse University; B.A. Finance, Finance; 1996

Business Experience

- Ingham Retirement Group; Investment Consultant; from 2005 to Present

Designations

Todd J. Levy has earned the following designations and is in good standing with the granting authority:

- AIFA; Center for Fiduciary Studies, University of Pittsburgh; 2007

This designation is offered by the Center for Fiduciary Studies. To obtain the AIFA Designation, candidates must successfully attain the AIF designation which consists of one exam and a three day intensive classroom program, complete a case study and pass an additional exam. In passing these exams, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.

- QKA; American Society of Pension Actuaries; 2007

Earning ASPPA's QKA credential requires successful completion of the following exams: Retirement Plan Fundamentals Part 1 (RPF-1), Retirement Plan Fundamentals Part 2 (RPF-2), Defined Contribution Administrative Issues – Basic Concepts (DC-1) and Defined Contribution Administrative Issues – Compliance Issues (DC-2). A minimum of two years experience in retirement plan related matters is required along with completion of ASPPA's QKA examination series to be a candidate for this credential.

Item 3: Disciplinary Information

Mr. Levy has no reportable disciplinary history.

Item 4: Other Business Activities

Mr. Levy, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. Mr. Levy, as an employee of Ingham Retirement Group, also provides pension

consulting services, pension administration and record keeping services to retirement plans and plan sponsors. Mr. Levy sometimes earns additional compensation from Ingham Retirement Group in connection with providing these services to clients.

Item 5: Additional Compensation

Mr. Levy does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Kenneth G. Ingham

Title: President & CEO

Phone Number: (305) 671-2200

Kenneth G. Ingham and other individuals as designated regularly review the accounts for which Mr. Levy provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Ingham directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Heidi Lee Miller, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Heidi Lee Miller **Born:** 1967

Education

- University of New Mexico; Bachelors, Arts and Science and Finance Concentration; 1990

Business Experience

- Ingham Retirement Group; Consultant; from 2007 to Present
- Ingham Retirement Group; Manager; from 1997 to 2007

Designations

Heidi Lee Miller has earned the following designations and is in good standing with the granting authority:

- AIF; Center for Fiduciary Studies, University of Pittsburgh; 2005

This designation is offered by the Center for Fiduciary Studies. To obtain the AIF Designation, candidates must successfully complete one difficult exam and a two day intensive classroom program. In passing this exam, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.

- QKA; American Society of Pension Actuaries; 2007

Earning ASPPA's QKA credential requires successful completion of the following exams: Retirement Plan Fundamentals Part 1 (RPF-1), Retirement Plan Fundamentals Part 2 (RPF-2), Defined Contribution Administrative Issues – Basic Concepts (DC-1) and Defined Contribution Administrative Issues – Compliance Issues (DC-2). A minimum of two years experience in retirement plan related matters is required along with completion of ASPPA's QKA examination series to be a candidate for this credential.

Item 3: Disciplinary Information

Ms. Miller has no reportable disciplinary history.

Item 4: Other Business Activities

Ms. Miller, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest nor does Ms. Miller earn any additional compensation from these clients for providing these services.

Item 5: Additional Compensation

Ms. Miller does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Kenneth G. Ingham

Title: President & CEO

Phone Number: (305) 671-2200

Kenneth G. Ingham and other individuals as designated regularly review the accounts for which Ms. Miller provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Ingham directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Marlon Suarez, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Marlon Suarez **Born:** 1993

Education

- Florida International University; Bachelor of Business Administration; 2020

Business Experience

- Ingham Retirement Group; Client Service Administrator; January 2020 to Present
- Green Mountain Corp., Sales Associate, January 2013 to January 2020.

Item 3: Disciplinary Information

Mr. Suarez has no reportable disciplinary history.

Item 4: Other Business Activities

A. Investment-Related Activities

1. Mr. Suarez is not engaged in any other investment-related activities.
2. Mr. Suarez does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

Mr. Suarez is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5: Additional Compensation

Mr. Suarez does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA and Chief Investment Officer

Phone Number: 305-671-2200

Todd J. Levy regularly reviews the accounts for which Marlon Suarez provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and individual client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee managers are held on a continuous ongoing basis.