

Ingham Retirement Group Form CRS

Item 1 Introduction

March 27, 2025

Ingham Retirement Group is registered with the Securities and Exchange Commission as an Investment Adviser.

Investment advisory services and fees differ and it is important for you to understand the differences. The SEC offers free and simple tools to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs) which also provides information tailored to educate retail investors about financial professionals.

Item 2 Relationships and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. These services include asset management, financial planning and consulting and retirement planning and consulting.

When providing asset management and advisory services we strive to understand your financial situation, goals, objectives and risk tolerance. We use the following investment types: mutual funds, stocks, bonds and exchange-traded funds (ETFs), among others. In addition we provide financial and retirement planning. We monitor the investments we advise on a quarterly basis and we review accounts on a monthly basis. For both financial and retirement planning we only make recommendations and monitor assets under our management.

You have the choice to receive non-discretionary or discretionary services from us. When we provide non-discretionary services, you make the ultimate decision regarding the purchase or sale of investments. When we provide discretionary services, we have authority to buy and sell investments in your accounts without requiring your pre-approval on an ongoing basis until you revoke this authority.

Minimum Account size is generally \$100,000 but exceptions will be made for Clients' family members and certain IRA rollovers.

For additional information including minimum investment amounts, please see www.ingham.com or <https://www.adviserinfo.sec.gov/IAPD/default.aspx> for our Form ADV, 2A brochure (Items 4 and 7 of Part 2A or Items 4.A. and 5 of Part 2A Appendix 1).

Conversation starters. Ask your financial professional:

- Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me?*
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3 Fees, Costs, Conflicts and Standard of Conflict

What fees will I pay?

Our fees will be assessed quarterly and are disclosed in our Form ADV Part 1A, Item 5.E. and more fully described in our Form ADV Part 2A, Items 5.A., B., C., and D. Some fees create a conflict of interest described below and in more detail in our Firm's Part 2A.

- If you pay an asset based fee, the more assets there are in your account, the more you will pay in fees. This could give us an incentive to encourage you to increase the assets in your account.

There are other fees and costs related to our investment advisory services and investments in addition to the principal fees and costs listed above that you will pay directly or indirectly. An examples of the most common additional fees are transaction fees for certain transactions which are paid to the custodian of the assets.

Additional Information:

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically Items 5.A., B., C., and D.) which can be found at www.ingham.com or <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

Conversation starters. Ask your financial professional:

– Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are examples to help you understand what this means.

Ingham & Company and Ingham/Russell Investment Advisors, Inc. are owned by U.S. Retirement Partners, Inc. Ingham & Company is a third party administrator and record keeper for retirement plans. Both Ingham & Company and Ingham/Russell Investment Advisors, Inc. are doing business as Ingham Retirement Group. Sometimes participants seek education or advice concerning their distribution and rollover options. In the event participants elect to rollover their accounts to an IRA managed by Ingham Retirement Group as an investment advisor, Ingham Retirement Group will earn investment advisory fees. In addition, there is an incentive for Ingham & Company to furnish referrals to Ingham/Russell Investment Advisors, Inc. and vice versa.

Conversation starters. Ask your financial professional:

– How might your conflicts of interest affect me, and how will you address them?

Additional information:

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically Items 5.A., B., C., and D.) which can be found at www.ingham.com or <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

How do your financial professionals make money?

- for certain clients Ingham consultants receive a percentage of the revenue the firm earns on assets associated with client accounts serviced by the consultant.

Item 4 Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. You can visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters. Ask your financial professional:

– As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5 Additional Information

You can find additional information about our services and request a copy of the relationship summary by visiting www.ingham.com; emailing at melanie.brown@daybright.com or calling us at 813-379-9549.

Conversation starters. Ask your financial professional:

– Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?