

IFCF Erisa 408(B)(2) Compensation Disclosure Statement

Introduction

This Compensation Disclosure Statement is provided to satisfy Department of Labor requirements that “covered service providers” provide certain disclosures regarding their compensation to qualified plans subject to Title 1 of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). This Disclosure Statement only applies to qualified plans or accounts that are custodied at IFCF. The following information is current as of June 30, 2012 and may be subject to change.

Stocks

New Issues: IFCF may make certain new issue products available without a separate commission. IFCF may receive compensation from issuers for participating in offerings as a selling group member and/or underwriter. If IFCF acts as underwriter but securities are sold through selling group members, IFCF will receive the underwriting fee less the selling group fees. The compensation IFCF receives is generally within the following ranges:

Securities Selling	Group Fee Range	Underwriting Fee Range
IPOs	3 – 4.5%	5 -7%
Follow-on offerings	2 – 2.5%	3 – 4%

Fee ranges are based on the investment amount. Refer to the applicable pricing supplement or other offering document for the exact percentage of sales concessions or underwriting discount.

Secondary Market Trading: IFCF may receive commissions for execution of purchases and sales of stocks. Commissions may be up to five percent (5%) of the principal amount of securities purchased or sold; however, IFCF may impose a minimum commission of up to \$65.00. Actual commission rates may vary by IFCF affiliate and branch. Please contact the registered representative servicing your plan should you require further information.

Payment for Order Flow: IFCF may receive compensation for directing orders in equity securities or options to particular broker-dealers and/or market centers for execution. The payer, source and nature of compensation received, if any, will vary based on the venue to which a trade is routed. Any such compensation received is generally less than or equal to 3 mills per share, which may be used to offset execution costs.

Bonds And Cds

New Issues: IFCF may make certain new issue products available without a separate commission. IFCF may receive compensation from issuers for participating in offerings as a selling group member and/or underwriter. If IFCF acts as underwriter but securities are sold through selling group members, IFCF will receive the underwriting fee less the selling group fees. The compensation IFCF receives is generally within the following ranges:

Securities Selling	Group Fee Range	Underwriting Fee Range
IPOs	3 – 4.5%	5 -7%
Follow-on offerings	2 – 2.5%	3 – 4%

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Secondary Market Transactions: IFCF may act as principal or agent in executing individual bond and other fixed income trades. When acting as principal, the price the client pays or receives will reflect the bid-ask spread at which an order is executed. IFCF stands to make or lose money depending on what happens to the price of the security while we hold it.

Mutual Funds

IFCF has contracted with certain mutual funds, their investment advisors, their affiliates and/or clearing brokers to receive compensation in connection with the sale and/or ongoing maintenance of positions in mutual fund shares in brokerage accounts. Such fees typically range from 0.25% to 1.10%. When clients purchase or sell mutual funds, either a front-end or back-end sales charge may be assessed by the fund company. IFCF may receive all or a portion of such sales charges. Compensation paid by mutual funds is further described in the applicable fund’s prospectus and statements of additional information. If you would like more information on specific contractual rates payable on mutual funds, call your Financial Advisor.

Other Investments

Options: IFCF may charge a commission of up to 5% of the principal amount of the option transaction; however, IFCF may impose a minimum commission of up to \$65.00. IFCF may receive compensation for directing orders to particular broker-dealers and/or market centers for execution. The payer, source and nature of compensation received, if any, will vary based on the venue to which a trade is routed. Any such compensation received is generally less than or equal to twenty-five cents per contract, which may be used to offset execution costs.

Unit Investment Trusts: IFCF may make certain new issue products available without a separate commission. IFCF may receive compensation from issuers for participating in offerings as a selling group member and/or underwriter. Fees from participating in distribution of Unit Investment Trusts generally range from 1% to 5% of the public offering price. Refer to the applicable pricing supplement or other offering document for the exact percentage of sales concessions or underwriting discount.

Real Estate Investment Trusts: IFCF may make certain new issue products available without a separate commission. IFCF may receive compensation from issuers for participating in offerings as a selling group member and/or underwriter. Fees from participating in distribution of REITs generally range from 1% to 5% of the public offering price. Refer to the applicable pricing supplement or other offering document for the exact percentage of sales concessions or underwriting discount.

Private Placements: IFCF may act as Placement Agent or Selected Dealer for certain issuers of securities for which there is no secondary market and/or which have limited liquidity. Fees from participating in distribution of Private Placements generally range from 1% to 5% of the offering price. Refer to the applicable offering document for the exact percentage.

Other Fees and Compensation

Float: IFCF provides clearing and other related services to customer accounts. In connection with the provision of those services, IFCF receives the use of amounts from the sale of securities prior to settlement, amounts deposited before investment, and disbursements amounts made by check prior to the check being cleared by the bank on which it was drawn. The use of such amounts may generate earnings (“float”) for IFCF or may be used by IFCF to offset its other operational obligations. To the extent such amounts generate float earnings, such earnings will generally be realized at rates approximating the Target Federal Funds Rate. Amounts deposited into an account, whether through sale of securities, receipt of dividends, wire, check or otherwise, are generally invested in the accounts core sweep vehicle by close of business on business day following receipt of the funds. Accordingly, IFCF receives use of the funds during that time. IFCF receives use of funds for amounts disbursed by check from the date the check is issued by IFCF.

Trade Errors: When a trade error is made in connection with our services to the plan, IFCF will correct the error as soon as possible after the error has been identified, with the goal of putting the plan in the same position that would have resulted if the error had not occurred. If the error is a result of our breach of our responsibilities to the plan, we will make the plan account “whole” for any losses that may have resulted. In some circumstances, correction of the error will result in a gain. If there is such a gain, IFCF may retain the amount of the gain, which may constitute part of our compensation for services to the plan. IFCF may also charge its representatives or third-party investment advisors a fee (generally \$25) for processing the error correction. In certain instances, IFCF may seek to recover any loss it incurs as a result of an error made by its representatives or third-party advisors.

Educational Conferences: From time to time, IFCF may host or attend educational conferences for audiences that may include independent record keepers and consultants, individual investors or other persons. Unrelated third parties may provide financial subsidies in connection with our hosting or attending such events. These sponsorships are generally unrelated to the services provided by IFCF to any individual plan.

Compensation paid by Correspondent Brokers: IFCF acts as a carrying broker for accounts introduced by correspondent broker-dealers and may receive compensation for providing services to those correspondent-broker dealers. Compensation received will vary by correspondent broker-dealer. Correspondent broker-dealers will charge separate fees for services they provide to qualified plans.

Compensation Paid by Financial Advisors: IFCF may receive compensation from registered investment advisors who act as fiduciaries to a plan. Compensation received will vary by advisor.

Special Fees: IFCF receives compensation for special services provided to accounts such as wire transfers, ACH transactions, additional statements, legal transfer fees, and other charges for special services. Refer to the Schedule of Fees provided by your Introducing Broker for details.

Trading Venue and Platform Ownership: IFCF may have an ownership interest in certain trading venues. To the extent that such venues are used, IFCF may receive an indirect benefit because the value of its interest in the venue may increase. IFCF may also have ownership interests in trade order management systems which it licenses or sublicenses to independent contractors or other third parties and for which it receives compensation.

MSRB Client Education and Protection

IFCF is registered with the U.S. Securities and Exchange Commission (SEC) and the Municipal Securities Rulemaking Board (MSRB). Complaints about financial professionals may be directed to the MSRB, which will direct the complaint to the appropriate authority. The “MSRB Investor Brochure” describing the protections that may be provided by the Municipal Securities Rulemaking Board rules along with how to file a complaint with an appropriate regulatory body can be found on MSRB’s website (msrb.org) or by using the following link: <http://msrb.org/msrb1/pdfs/MSRB-Investor-Brochure.pdf>