

DECLARATION OF RAYNALDA N. MILORD

Pursuant to 28 U.S.C. Section 1746, the undersigned states as follows:

1. My name is Raynalda N. Milord. I am over twenty-one years of age and have personal knowledge of the matters set forth herein.
2. I am a Senior Paralegal Specialist at the U.S. Securities and Exchange Commission (the "Commission").
3. The Commission received video file A Better Financial Plan Very Happy Clients. As part of my duties at the Commission, I sent this video file to Diversified Reporting Services, Inc. and ordered a transcript.
4. A true and correct copy of the transcript of video file A Better Financial Plan Very Happy Clients is attached as Exhibit A hereto.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed on this 22nd day of July 2020.


RAYNALDA N. MILORD

1 UNITED STATES SECURITIES AND EXCHANGE COMMISSION



2

3 In the Matter of:)

4) File No. FL-04188-A

5 UNITED FIDELIS GROUP)

6

7 SUBJECT: A Better Financial Plan --

8 Very Happy Clients!

9 PAGES: 1 through 4

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VIDEO TRANSCRIPTION

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Diversified Reporting Services, Inc.

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(202) 467-9200

1 P R O C E E D I N G S

2 (Music playing.)

3 MR. VAGNOZZI: I want to have some fun here.

4 So Wes, I'm going to ask them a question and I want

5 all of us -- there's a lot of naysayers out there.

6 Show of hands. Who's customers? Customers?

7 How many of you are getting a check every

8 single month?

9 Do me a favor, stand up. If you're getting

10 a check every single month, stand up.

11 (Laughter.)

12 MR. VAGNOZZI: Okay. How many are getting

13 double digits every single month? Stay up.

14 (Cheers.)

15 MR. VAGNOZZI: Right? How many people are

16 thrilled with that message?

17 (Applause.)

18 MR. VAGNOZZI: Right? Do you see all this?

19 Do all payments -- skeptical, right? Are we

20 delivering?

21 AUDIENCE: Yes.

22 MR. VAGNOZZI: Is the investment delivering?

23 AUDIENCE: Yes.

24 MR. VAGNOZZI: All right. 'Cause -- because

25 the next client that comes in and says, "I'm not sure

1 if I should do this." I'm going to play this clip for
2 them. They, they were all skeptical. Every single
3 one of them is skeptical. And they are all
4 delivering.

5 We've done everything we said with this as
6 far as this is concerned, right?

7 AUDIENCE: Yes.

8 MR. VAGNOZZI: Right? You're happy.

9 (Cheers and applause.)

10 MR. VAGNOZZI: We specialize in alternative
11 investments that have a proven track record of getting
12 8 to 14 percent returns.

13 AUDIENCE: Yes.

14 MR. VAGNOZZI: Okay. That's all. You can
15 sit down now.

16 (End of video file.)

17 * * * * *

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1 I, Lee Ann Tardieu, hereby certify that the foregoing
2 transcript is a complete, true and accurate
3 transcription of all matters contained on the recorded
4 proceedings in the matter of
5 A Better Financial Plan -- Very Happy Clients!

6

7 *Lee Ann Tardieu*

8 Transcriber

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2. I am a Senior Paralegal Specialist at the U.S. Securities and Exchange Commission (the "Commission").
3. The Commission received audio file Bill Bromley Mixdown. As part of my duties at the Commission, I sent this audio file to Diversified Reporting Services, Inc. and ordered a transcript.
4. A true and correct copy of the transcript of audio file Bill Bromley Mixdown is attached as Exhibit A hereto.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed on this 22nd day of July 2020.

Raynalda Milord
RAYNALDA N. MILORD

1 UNITED STATES SECURITIES AND EXCHANGE COMMISSION

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3 In the Matter of:)

4) File No. FL-04188-A

5 UNITED FIDELIS GROUP)

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7 SUBJECT: Bill Bromley Mixdown

8 PAGES: 1 through 33

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15 AUDIO TRANSCRIPTION

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24 Diversified Reporting Services, Inc.

25 (202) 467-9200



1 P R O C E E D I N G S

2 Bill Bromley Mixdown

3 MR. LAUBSCHER: Welcome to the Cash Flow
4 Ninja, the podcast sharing how to create and grow
5 income streams and manage, multiply, and protect your
6 wealth in the new economy.

7 Are you tired of trading your time for
8 money, you desire freedom today instead of retirement
9 in 10, 20 or 30 years? I am M.C. Laubscher and this
10 is the Cash Flow Ninja.

11 Hello, Cash Flow Ninjas. It's M.C.
12 Laubscher here, and welcome to another episode of the
13 Cash Flow Ninja. We have got a great show for you
14 today. In today's show we're going to look at
15 Merchant Cash Advance cashflow, and I'm joined today
16 by Bill Bromley.

17 Bill is the president and CEO of Capital
18 Source 2000. Bill, welcome to the show.

19 MR. BROMLEY: M.C., thanks an awful lot. I
20 am excited to have a chance to talk to some of your
21 people, and this is a business that I think is -- you
22 know, is exciting and hope to be able to share that
23 with a lot of your current investors and current
24 listeners.

25 MR. LAUBSCHER: Absolutely. The first time

1 I came across this business and started just educating
2 myself on it and preparing a little bit for our
3 interview today, I was just kind of blown away. So I
4 am super excited to be sharing this with our listeners
5 and viewers, Merchant Cash Advance business and cash
6 flow.

7 But before we get into that, Bill, can you
8 please share a little bit about your background and
9 journey with my listeners?

10 MR. BROMLEY: Sure, sure, so I am a lifetime
11 banker, local guy in the Philadelphia market. So I
12 have been operating in that market for a long time. I
13 went to college there. I went to graduate school,
14 M.B.A., that kind of thing, but started working for
15 big banks.

16 But, really, I think there is a entrepreneur
17 piece that I have always felt was important, and then
18 after working at larger banks at about -- I was 36
19 years old, I started a bank in the Philadelphia region
20 with investors.

21 I went out and raised \$7 million and really
22 went into my own business but it was banking, and but
23 small businesses and small banks strictly do lending
24 to companies. That's where the opportunity is, and so
25 that's what I have done.

1 I was introduced to a fellow in this
2 business, who is now my partner, about five years ago,
3 and I didn't -- he is a banker for 30 years running
4 banks. I had no idea that this niche exists and it me
5 months.

6 I looked at it for four months to find out
7 if it's real because in banking, you know, you lend
8 money at six percent and you have a cost of funds of
9 two, and you're working on four points maybe. In this
10 business it's totally different, but it's about
11 expanding businesses and it's high rate but high
12 return.

13 MR. LAUBSCHER: Yeah, absolutely. Well,
14 share -- if you don't mind sharing with my listeners
15 and viewers what exactly it is, how it works, and then
16 also what -- what is the problem it's solving for the
17 marketplace, too, because it really solves a very big
18 challenge or problem for a lot of business owners?

19 MR. BROMLEY: Yes, yes. So, as I was trying
20 to understand this business, I -- you know, I was
21 talking to a partner and he said -- he said, no. He
22 said, we put money out. It's venture capital money,
23 but it's for expansion.

24 And the first and most important piece to
25 remember in this is that these are not companies that

1 are struggling. These are companies that are doing
2 very well. They have lots of cash flow and we measure
3 cash flow in a little different way than I have for 30
4 years as a banker because we look at their checking
5 account and what flows through their checking account
6 on a monthly and annual basis.

7 And that's really how we underwrite, but the
8 opportunity is that these businesses are always
9 looking for -- the good ones are looking for a second
10 location, a third location, but they invariably need
11 capital to do it and while the cash flow in their
12 business is strong they don't usually -- these people
13 don't usually have real estate or hard collateral
14 which banks like, and they're not interested in taking
15 on new locations or new parts of -- even of an
16 existing business.

17 So when you have a -- even a pizza parlor
18 who decides that he -- boy, if he could put a deck on
19 the back of his pizza shop, he might be able to put 30
20 tables out there. He might be able to seat, you know,
21 at lunch time maybe a hundred more meals, and he needs
22 \$100,000 to do it.

23 So that's our ideal kind of a deal. We will
24 do that deal. We'll do it in two days because when
25 small businesses want money they need it quickly not

1 90 days like a bank does. So we can analyze it, we
2 can underwrite it, and we can close it within two days
3 and disburse the money to him.

4 And what we're looking at is his current
5 business cash flow, the money through their checking
6 account statement and an anticipated cash flow coming
7 from these new tables that he is going to put outside.

8 So he may take, you know, two months to
9 build the deck on, put the tables in place, or
10 whatever, and our underwriting, which is -- because
11 our money is expensive. It's about 35 percent. It's
12 a 1.35 factor rate for the period of the loan.

13 But the point -- this is very important --
14 is that it's very short term. It's only six months.
15 So when you look at the total cost, not the 35
16 percent, which is daunting, and the way we underwrite
17 is to say, look, what is this guy going to do with our
18 money that he can make more money than it's going to
19 cost to borrow it from us? And that's basically a
20 very small example of how the business operates.

21 MR. LAUBSCHER: The one percent grow their
22 business and investments every year regardless of the
23 economy and marketplace and pay very little or no
24 taxes legally. Besides having the right mindset,
25 elite strategies and tactics, and the counsel of elite

1 wealth advisors, coaches and mentors, they have access
2 to opportunities that the rest of the population do
3 not.

4 If you're an accredited investor, we have a
5 network that provides Cash Flow Ninja listeners access
6 to exclusive business and investment opportunities.
7 To join our investors network, please apply at
8 cashflowninjainvestorsnetwork.com. That's
9 cashflowninjainvestorsnetwork.com.

10 I thought you brought it together really
11 nicely there. So for listeners and viewers, just to
12 put it into perspective, too, like Bill already did,
13 but just to reiterate some of it, is business owners
14 are -- you know, there is different types of
15 businesses and there is -- there is different needs
16 for money for businesses, right.

17 You need money to expand, as Bill mentioned.
18 You need money to grow the business, and then
19 sometimes there is even seasonal businesses, right,
20 where, um, let's just say, um, there is businesses
21 that do a lot of sales during the holiday period that
22 needs capital, but they don't have capital.

23 They know that it's there. They were going
24 to come into that money. But, you know, it's the
25 chicken or the egg. First, you have to get the money

1 to get all of the product and inventory to be able to
2 sell that, and then you are going to make more money
3 but there is a bridge that this niche is providing in
4 a time -- I'm going to say -- there is a gap that it's
5 filling for business owners that need capital on the
6 short term and it's secured collateralized by the
7 receivables, right, the cash flow --

8 MR. BROMLEY: Yes.

9 MR. LAUBSCHER: -- of the business, not the
10 hard assets because that's why they can't get, you
11 know, a business loan, as you mentioned, because most
12 of them don't have the hard assets and/or maybe they
13 have it but they need capital in the short term,
14 right --

15 MR. BROMLEY: Yeah.

16 MR. LAUBSCHER: -- immediately, not two,
17 three, or four months, or however long it takes to
18 close the business loan.

19 MR. BROMLEY: Yeah, if I could give you
20 another example that would be -- it's a very different
21 type of the one I just said, but I got a call from one
22 of my banker friends who had a ready mix cement
23 company that did \$10 million a year, had three
24 locations, 56 cement trucks, owned free and clear,
25 called their bank and said, we just got an order from

1 one of the largest developers in the area and we need
2 to increase our line of credit because we already
3 have -- our line is heavily drawn building on supplies
4 for the spring and now we've got this large contract,
5 can you help us?

6 Oh -- bank -- sure, we'd be glad to help you
7 because you are a very good customer. You have got
8 all of these assets and they were -- so the question
9 is, okay, we would like to have \$600,000 by Monday,
10 and the bank goes, well, well, wait a minute. We have
11 to get an appraisal. We have to go check out the
12 latest financials on your company, but then we would
13 be glad to give you a line.

14 So the owner, the woman called me and
15 explained her need and I talked to her about how we
16 would do it, what we would do and that we absolutely
17 could do this deal and we would have the money in her
18 account on Monday but it would be at 35 percent for
19 the period of time the money is out.

20 And she was -- you know, she really choked
21 on that a little bit but she said, you know what -- I
22 said this is -- let me explain why I think we could
23 look at this. I understand that you need to increase
24 your line and you need that money immediately because
25 you have got to execute contracts.

1 Let's talk about how much money you might be
2 able to make from the contracts because this money is
3 going to cost her, say, \$135,000. How much can you
4 make from the contracts?

5 Well, it's really over a million. So that's
6 how this gets done. So we gave her the money on
7 Monday, 90 days later, the bank paid us off because
8 they finally got everything together.

9 It's an example of some of the -- you know,
10 there are small companies like pizzerias, there is
11 bank owned companies -- bank owned -- bank -- you
12 know, very good bank customers and some public. We do
13 about 16 public companies, all for the same reason of
14 speed with the cash.

15 MR. LAUBSCHER: That's a great example
16 because I think when you initially said a factor rate
17 of 1.3 -- 1.35 --

18 MR. BROMLEY: Yes.

19 MR. LAUBSCHER: -- at 35 percent, people
20 would say (whistles), why?

21 MR. BROMLEY: Yeah.

22 MR. LAUBSCHER: Why would anyone do that?
23 But putting it in perspective that the cost of capital
24 is \$100,000, was \$135,000, in that example --

25 MR. BROMLEY: Yes.

1 MR. LAUBSCHER: -- they would be missing out
2 on over a million by not doing that, you know, it's
3 all relative if you look at it from a big picture
4 perspective.

5 My friend, Brian Page, has created a cash
6 flow machine generating over \$100,000 in six months
7 without owning any real estate. The system consists
8 out of renting properties from property owners and
9 renting them out on Airbnb.

10 The system is so simplistic, it could be
11 managed by virtual assistance and yet so effective and
12 powerful that it predictably generates cash flow every
13 month. Brian and I are hosting a webinar where he
14 shares his system and how it generated over \$100,000
15 in six months for him personally.

16 You can access this life changing webinar at
17 cashflowninja.com/bnb. This is one of the greatest
18 cash flow opportunities I have seen since I have
19 started my podcast. Again, the URL is
20 cashflowninja.com/bnb.

21 MR. BROMLEY: Absolutely, absolutely.

22 MR. LAUBSCHER: What are some -- if you can
23 maybe give us another example and just tell us and
24 walk us through the steps of this entire process.

25 MR. BROMLEY: Sure, sure, a good example is

1 that we do -- we'd like to do more and more of this as
2 a franchise. Franchises, you know, they are sold by
3 territory and maybe a guy has got -- his first three
4 franchises are in the territory and he has a chance to
5 buy the next territory for \$150,000.

6 What we can do, first of all, is we get our
7 business mostly by call centers. We have three
8 regional call centers, New York, Philadelphia, and
9 Florida, and we have about 200 people on the phones.

10 So we raised our customer, or we contact our
11 customers primarily by outgoing calls and we do that
12 by getting lists, lists of people that have applied
13 for financing, are looking for financing maybe turned
14 down, or whatever, and obviously franchise work very
15 well for this.

16 So we had a guy that had three UPS
17 locations, wanted to buy another location, needed
18 about \$150,000, and but we were able to look at the
19 cash flow of his three current locations which was
20 substantial, and you know actually what happened is he
21 ended up buying two different regions because we were
22 able to boost that up.

23 Based on the flow that we saw coming through
24 his checking account on a monthly basis, we were able
25 to increase the size of what he was looking for and

1 get him a \$200,000 advance.

2 He then took that, paid us back, again, from
3 the cash flow. This is the money flowing through his
4 checking account. We were paid back in about 70 days,
5 and then he came back in immediately because he wanted
6 to build or actually fit out two more UPS locations.

7 And, um, the bottom line of that is that
8 when you do that the money cycles, the money comes
9 back to us very quickly because we don't bill
10 customers, we charge it directly out of their checking
11 account every business day, so it comes back to us
12 quickly.

13 Our challenge is to put it back out into
14 good advances, but for him you know once it's paid off
15 there is no equity lost in his business and he's right
16 back in saying, okay, this great. It's worked out
17 well, now I want to build two more UPS locations in
18 strip centers. There is no real estate. I need
19 150,000 for each one, and we do that.

20 Interesting point though, so we do
21 diligence. Our diligence though is very much on the
22 internet. It's very much about background checks.
23 It's about customer comments, Yelp. The part that's
24 very banker like and hard money like is that we go to
25 every location and take pictures and interview the

1 CEO.

2 Now, how do we do that in two days? We use
3 a national appraisal company and we do -- one of the
4 three of us in the company will interview the CEO.
5 And what we're looking for there is their commitment
6 to the business, not -- what we are not looking for is
7 we don't want to hear that this is one of four
8 businesses they have and we want to know that he and
9 his personal values, his personal net worth, et
10 cetera, are behind the business.

11 As long as they are in it and in it to stay,
12 business location is good, you know, it's a very
13 viable business because there is obviously fraud
14 situations in this. We move ahead and we move ahead
15 quickly and in two days the money is there.

16 MR. LAUBSCHER: How does the repayment work?

17 MR. BROMLEY: Good question. So if you
18 disburse -- we just disbursed a loan today to a
19 company, tomorrow morning we will charge her checking
20 account for one one hundredth of that loan amount plus
21 our fee.

22 So, say, it's a \$100,000 loan -- or it's an
23 advance, it's not really a loan -- we'll charge one
24 one hundredth of \$135,000 tomorrow, and the next day,
25 and the next day after that until we go out six or

1 seven months and we're paid off entirely. For us, in
2 terms of risk and looking at loans and payments, at
3 about 70 days we have all of our money back.

4 So if we -- once we get to 70 days, if we
5 have some issues that come up after that or we have to
6 slow down, someone has run into a downturn, we're
7 flexible on the payments because we have to try to do
8 the best we can, but we're also looking out for the
9 business and if we strangle them because we are
10 lightly secured, you know, we're going to shoot
11 ourselves in the foot.

12 So we will work with them and work well, but
13 that's basically how the repayment works. And that's
14 why we have over 65 percent of the companies come back
15 in, not because it's like payroll, like payday
16 lending, where they're stuck in, it's that the project
17 is done and now they have got another one to move
18 into, which is very successful.

19 MR. LAUBSCHER: Right. And some of our
20 listeners and viewers might think how big is this
21 marketplace because we listed a couple of specific
22 companies and I mean this is a perfect fit obviously
23 for small- and medium size businesses maybe you just
24 want to speak to the size of the market that you're
25 solving the problem for because just from my research

1 I was kind of blown away.

2 MR. BROMLEY: You know it's interesting --
3 that's a very good question and everybody would want
4 to know the answer to that. But so, there is a couple
5 of parts. So, Morgan Stanley has tried to evaluate
6 this business because there is an awful lot of
7 participants.

8 They're smaller companies, even smaller, a
9 lot smaller than we are that are in it. But the
10 estimate is that they there will be about \$50 to 75
11 billion done in this business this year.

12 Another way to assess this is that some of
13 the biggest guys in the country are now in this
14 business. So OnDeck Capital was started as a merchant
15 cash company but they have expanded. They do a lot of
16 different types of loans.

17 They have had, I think, somewhat mixed
18 results in terms of being public, and they had a
19 relationship with J.P. Morgan Chase, which speaks to
20 the fact that his piece, this segment of the market is
21 something that the banks want to participate in, but
22 they don't put it on their own balance sheet.

23 Other players though, PayPal is in this.
24 Amazon does over a billion -- \$11 billion a year in
25 this business. Square is in the business, and we see

1 an increasing number of finance and fintech companies
2 that are doing this.

3 The other piece of this that I think is --
4 well, it's not important but this is very
5 interesting. -- you know I have watched Shark Tank,
6 like many people, from the very beginning and the
7 seven original sharks, every one of them has one of
8 these businesses. They are all in it, including
9 Cabbage, OnDeck, right down the line.

10 MR. LAUBSCHER: Yep.

11 MR. BROMLEY: So it's a very rapidly growing
12 business but I have to tell you something that's
13 surprising and that is 15 years ago it didn't exist.

14 It really grew after the 2008 recession
15 where the banks had really pulled back that they never
16 went back into the small business market the way they
17 had been in it previously and this type of niche, this
18 type of niche lending is what grew out of that.

19 Maybe it was done by friends and family
20 before, maybe it was credit cards, but now it's a very
21 viable piece of the market and most of the financial
22 institutions, insurance companies, banks, et cetera,
23 are putting this in some part of their portfolio.

24 MR. LAUBSCHER: M.C. Laubscher here, the
25 creator of the Cash Flow Ninja and cash flow coach and

1 producer, as well, where we help our clients integrate
2 infinite banking with their business and investments.
3 To learn how you can create your own banking system,
4 to turbo charge your investments and business in 30
5 days or less, go to yourownbankingsystem.com. That's
6 yourownbankingsystem.com.

7 Yeah, I was blown away when I did my
8 research, too, and I came across the sharks, too, that
9 they are all in this, Mr. Wonderful, Barbara --

10 MR. BROMLEY: Yep.

11 MR. LAUBSCHER: And they're all very, very
12 much involved in this industry and there is a lot of
13 other big players like you have just mentioned coming
14 into it because, um, maybe we'll talk -- if you could
15 share a little bit from an investor standpoint what
16 that looks like and the benefits to an investor, and
17 some of the ways that investors can get involved in
18 this industry.

19 MR. BROMLEY: Sure, sure. So the way that
20 we do this and this is -- we're pretty typical in the
21 industry -- is that we finance 100 percent of our
22 entire portfolio, our entire, you know, backing of the
23 portfolio that we have out there. It is accredited
24 investors.

25 We sell secured notes. Our notes are

1 secured by all of the assets of the company, all of
2 the loans that are outstanding, and we have
3 approximately right now in our company we have about
4 250 investors. They hold notes anywhere from 100,000
5 up to several million, and the rates that we pay on
6 those are 10 to 16 percent.

7 The fluctuation in the rate is based on
8 whether it's one year, two year, or three year that
9 the notes is for, and it's for amounts whether the
10 amount is \$100,000 or above 750,000, so at 750,000 for
11 three years that's where the 16 percent comes in.

12 MR. LAUBSCHER: Very, very interesting.
13 What are some of the risks, Bill, of those four
14 investors and how do you manage and mitigate risks in
15 this --

16 MR. BROMLEY: Sure.

17 MR. LAUBSCHER: -- in this niche?

18 MR. BROMLEY: Yeah. Well, first of all, so
19 you would say that this is a -- I would call it
20 lightly secured. Yes, we, in fact, do take the
21 receivables of the company. We will take other
22 collateral, but most of the reasons they're talking to
23 us is that they don't' -- they are not people that can
24 go into a bank partly because a bank is not interested
25 in lending in this business or they don't -- they

1 don't have that comfort level that they can do it at a
2 one percent loss ratio.

3 The opportunity for investors really has to
4 do with, you know, looking at what the company has
5 done. It has got to have a long track record. As I
6 said, we have been at this for eight years and we have
7 never missed a payment to any of our investors in
8 those eight years every month.

9 But what does that -- how does that really
10 work? The real deal here is the underwriting, and the
11 underwriting in our case is, you know, how we assess
12 the company, how we -- the diligence that we do, the
13 reputation of the company in the marketplace are all
14 pieces that we work on very diligently.

15 But then the underwriting is that, as I said
16 earlier, is that if you're going to pay us 35 percent
17 for this money, how are you going to make that back
18 and what is it about what you're doing with it that's
19 going to allow that to happen?

20 So that's really how we -- that's really the
21 key to underwriting. But the risk profile is
22 important in that, first of all, this is very short
23 term. So when you talk about people that, you know,
24 there might be an economic downturn.

25 There could be illness, there is divorce,

1 it's the same thing that every banker has run into
2 when they're doing a three-, four-, or five year loan
3 those risks are there but they're significantly
4 mitigated by the fact that this is -- in six months
5 we're in cash.

6 So when I talk to investors, invariably,
7 they say, what happens if there is another 2008
8 recession? Very good question, should always be asked.
9 The unusual part about our business is that in 30
10 to -- in six months our \$30 million could be in cash.

11 So the biggest risk I explain to investors
12 is that if we can't find good deals to do, the most
13 important lesson we have learned is you do nothing,
14 you sit on the cash.

15 And, believe me, when the cash is piling up
16 at \$5, 6, 7 million in your checking account, it's not
17 terribly comfortable but it's the single most
18 important part of our business that you never put
19 something out because you feel a pressure to put the
20 cash out.

21 The answer to that would be that you would
22 call up the investors and say, look, we have paid you
23 the rate of interest that we promised you, but we
24 can't find good loans and rather than take a risk that
25 we don't want and you don't want, we'll give you your

1 money back. That has never happened and we're very
2 pleased about that, but that's one of the major risks.

3 The other is that you're not investing in a
4 note, you're investing in our company. We have right
5 now about between 550 and 600 notes outstanding. You
6 have a small piece of every one of those notes. So
7 our track record, which is from the beginning, since
8 the beginning of our company, our loss experience is
9 three percent, is three percent or less.

10 So it's very important to have a large
11 number of notes in order to make sure that the loss is
12 covered. Our margin is also significant. You know,
13 we're obviously at 35 percent our loss experience
14 would not -- it would not be a problem if it goes up
15 to 10, 15, 16, 18, 20 percent, but I'll tell you in
16 our mind it would be terribly difficult.

17 The first thing we would do is look at where
18 did we make a mistake, what's wrong? You know, shall
19 we start this, shall we stop this? Which industry
20 should we stay away from?

21 So we're doing that all of the time and
22 watching it closely in order to protect our investors'
23 money, but we can still put it out and we still do
24 that. So those are a couple of the major mitigants,
25 but the biggest thing I would say, honestly, is that

1 you want to have a small piece of a whole lot of
2 notes.

3 The losses, by the way, are all ours. Our
4 investors have always been repaid for the last eight
5 years, you know, we continue to do that. But it's
6 based on the fact that we're getting larger, our
7 underwriting has not faltered at all, and we're
8 looking at expansion.

9 As I mentioned, our company has about 30
10 million on the street right now but my partner, who
11 has been in the business longer than I have, has close
12 to 400 million. We do deals together. We buy with
13 smaller parts of his deals. We participate with his
14 deals. And, you know, when he is doing a million
15 dollar deal, we may take 100, \$200,000 piece of it.

16 So we have a couple of unique pieces that
17 make us a little different than other people in the
18 industry. But, you know, the track record is excellent
19 and the profit margin is strong, which is exactly what
20 your investors want to hear because they're assured
21 that their interest comes out first. We get whatever
22 is left over in the end after losses, et cetera.

23 MR. LAUBSCHER: Yeah, absolutely. So in
24 this niche, folks, you know, obviously, on a smaller
25 scale can invest directly into certain deals, and then

1 there is the fund model, am I correct?

2 (Crosstalk)

3 MR. BROMLEY: Yes, yes, that's a good point.

4 MR. LAUBSCHER: -- is that one?

5 MR. BROMLEY: Yes, so we actually run a
6 fund --

7 MR. LAUBSCHER: Yeah.

8 MR. BROMLEY: We run a fund. It encompasses
9 the entire portfolio. There are some -- especially on
10 the real estate side, you may be familiar with people
11 that sell -- buy and sell notes.

12 MR. LAUBSCHER: Yep.

13 MR. BROMLEY: That's not something that we
14 do. I don't think it's a good way to do it here,
15 especially if -- because you have -- you don't have
16 the collateral real estate behind it.

17 MR. LAUBSCHER: Mm-hmm.

18 MR. BROMLEY: So I think that in this
19 particular risk category or risk profile having a lien
20 on every note in the portfolio is a way to be the
21 safest and the best way to go, That's why we have
22 done it that way, and we don't sell individual notes.

23 MR. LAUBSCHER: Life settlement investments
24 have allowed financial and banking institutions to not
25 only buy their equity contractually, but also

1 diversify their capital from any economic markets and
2 geopolitical risks.

3 It's been part of the billion dollar
4 blueprint followed by institutional investors. And if
5 you're an accredited investor you can also now
6 participate in this vehicle with enormous growth
7 potential.

8 We can watch an informational webinar
9 presented by one of the premier organizations
10 providing life settlement investments, a number of
11 solutions, at cashflowninja.com/lifeselements.

12 And another thing that I also just want to
13 mention is because within the fund model you get to
14 invest and have a small piece of a bunch of notes, as
15 you mentioned, that could be in many different
16 industries, too, which is -- I mean that's a positive,
17 too, instead of just being specifically invested in,
18 for example, one industry, right? So it's more -- how
19 can I say -- that's another risk mitigation factor?

20 MR. BROMLEY: Yeah, you know, a really good
21 point and one that I had left out. But, yeah, we deal
22 with about 26 different industries and we do it all
23 across the United States.

24 So diversification in terms of industry,
25 diversification in terms of geography are also real

1 key factors, aside from the fact that you have a small
2 piece of a large number of notes. But that's --
3 that's very important in terms of their performance
4 and protecting the investors.

5 MR. LAUBSCHER: Yeah, I am just thinking
6 for, you know, when I was looking into this why would
7 someone choose the fund model versus the individual
8 ones, right?

9 So I had all of these questions kind of in
10 my mind and then it makes -- from a risk management
11 standpoint, and if there is, like you mentioned, a
12 potential -- you know -- another downturn or
13 recession, and so forth, then if you're heavily vested
14 just in one deal that's in one industry, obviously
15 you're leading yourself up to a lot more risk and
16 exposure to risks.

17 MR. BROMLEY: That's absolutely, and so we
18 recommend it this way. Our customers, you know, have
19 had -- have great success. As I said, we have got
20 several hundred investors in the portfolio.
21 Obviously, we have had a number of notes that have
22 matured and we have only had less than 10 out of those
23 several hundred that have taken their money back out.

24 Everyone else has re upped to stay in, so
25 they like it, they get comfortable with it, and they

1 see the way it operations, which is very important.
2 When the money -- you know we try to send the money to
3 the bank accounts of each of the investors on the
4 exact same date that they invested.

5 So if their date is the 15th, unless it
6 falls on the weekend, you can expect that you'll see
7 the money in there. It's wired. It's not sent
8 through the mail and that performance is something
9 that gives you credibility and builds comfort among
10 the investors. That's why it grows.

11 MR. LAUBSCHER: Yeah, absolutely,
12 fascinating niche, very, very, interesting stuff.
13 Bill, one habit I have observed from wealthy and
14 successful people is that they are always learning.
15 They're always studying. What are you currently
16 studying and learning?

17 MR. BROMLEY: Well, I appreciate that. So I
18 had a lesson just the other day. Because, obviously,
19 I am working constantly on the loan side, the
20 underwriting side, making sure we're managing this
21 properly and talking to the investors.

22 One of the things that I missed almost
23 completely is that the investor said to me, you know,
24 I don't think you understand what you're doing for us.
25 And I said, well, you know, I am giving you a good

1 investment.

2 He said, no, no, no. He said, my son -- my
3 son is a worldwide, world ranked ski racer right now,
4 all over the world. I said, wow. And he said, he
5 just got a full scholarship to the University of
6 Denver, which I didn't know about, but that's a --
7 that's the ski racing team in the United States
8 apparently.

9 He said, that kid would not have even had a
10 chance to do any of this without me investing this
11 money in the company. And I think one of the things
12 that's important is to realize the benefit, not the
13 day to day numbers that, as a banker, I have done for
14 a long time.

15 But when you can do a deal for somebody --
16 and maybe it's a deal that's a little tougher, or you
17 believe in the family a little bit, whatever, it comes
18 back many, many times over, but when -- and I got to
19 tell you, from somebody that is dealing money and
20 making loans to people, or in this case, to
21 businesses, they never forget.

22 And it's one of the most heartwarming and
23 the best parts about -- you really feel like you have
24 got -- you're on the right side of things when you're
25 doing this.

1 Secondly, I think even as this business has
2 grown and it's obviously become successful and
3 worthwhile, it's to really look at the details. Do
4 not ever forget, you know, the nuts and bolts of what
5 you're doing and to, you know, get going too fast or
6 start to delegate it. Keep an eye on all of those
7 small pieces in terms of -- in terms of what's
8 happening.

9 And the last is the opposite, keep a look at
10 the big picture. You know, where do you see things
11 going? Where do you see things changing? When you
12 see people like Amazon and PayPal that are coming into
13 this industry that's a great thing. It speaks to the
14 industry and the credibility but what can you learn
15 from them? What can you learn about how they do
16 business?

17 And M.C. that's one of the reasons I am
18 talking to you today is that I have raised money
19 through friends and family, friends at the golf
20 courses, country clubs, people that had invested in
21 the banks that I had built, that kind of thing.

22 But it's, you know, you need to look at
23 the -- you know, at the new stuff, at the current
24 stuff, at the way to spread the word, and you know I'm
25 learning that part. I'm hoping to learn that part, I

1 should say.

2 MR. LAUBSCHER: Yeah, absolutely, always
3 learning. And our core message in our show is to
4 leave our families, communities and the world better
5 than we found it by passing down a mindset, values and
6 principles to future generations, not just money.

7 So, Bill, if you cannot pass on any money to
8 future generations and were only allowed to pass on
9 three principles to them to build wealth and achieve
10 happiness and success what would they be?

11 MR. BROMLEY: I would say constantly look at
12 the -- at people that are successful or where you are
13 hoping to go and don't be -- don't be shy about
14 meeting them, trying to meet them, et cetera. Never
15 lose sight of your principles, in terms of what you
16 believe in, whether it's, you know, spiritual, whether
17 it's your daily habits, or whatever.

18 And the last is that if there is a problem
19 with someone and you have to take one on the chin,
20 absolutely look for your long term reputation, take a
21 loss on somebody, give them their money back. We have
22 had people that have had financial problems in the
23 middle of it, give them their money back, they will
24 never forget it.

25 MR. LAUBSCHER: Yep.

1 MR. BROMLEY: And that's worked well.

2 MR. LAUBSCHER: Absolutely. Where can
3 listeners and viewers learn more about you and your
4 company and the services that you guys offer?

5 MR. BROMLEY: Okay. Well, our website is
6 capitalsource2000.com, but I will tell you that it's
7 not -- you can't search it. You have to just put that
8 directly in the -- you know -- in the browser.

9 MR. LAUBSCHER: Browser.

10 MR. BROMLEY: Proper search browser, yes.
11 So it's a small website, but I also -- please email me
12 at wbromley@capitalsource2000.com; cell phone is (610)
13 291-7722, and I'll be glad to send you private
14 placement information, a PowerPoint presentation, and
15 would welcome the opportunity to talk to you or talk
16 to a group.

17 I am certainly willing to travel all over
18 the country because it's a tremendous opportunity and
19 for people that are just getting into it, I have a
20 long list of investors that they're welcome to talk to
21 about their experience.

22 MR. LAUBSCHER: Fantastic. Well, Bill, thank
23 you so much for coming on the show and sharing your
24 journey and your knowledge and providing so much value
25 to my listeners. It's been a pleasure meeting you,

1 and thank you so much for coming on the show.

2 MR. BROMLEY: M.C., thanks a lot, its great.

3 I love what you're doing.

4 MR. LAUBSCHER: Perfect, let me stop here.

5 (End of audio file.)

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1 I, Beverly Peterson, hereby certify that the foregoing
2 transcript is a complete, true and accurate
3 transcription of all matters contained on the recorded
4 proceedings in the matter of:
5 Bill Bromley Mixdown.

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9

A handwritten signature in cursive script that reads "Beverly R. Peterson". The signature is written in black ink and is positioned to the right of the line numbers 8 and 9.

10 Transcriber

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DECLARATION OF RAYNALDA N. MILORD

Pursuant to 28 U.S.C. Section 1746, the undersigned states as follows:

1. My name is Raynalda N. Milord. I am over twenty-one years of age and have personal knowledge of the matters set forth herein.
2. I am a Senior Paralegal Specialist at the U.S. Securities and Exchange Commission (the "Commission").
3. The Commission received video file A Better Financial Plan Ideal Investment Video. As part of my duties at the Commission, I sent this video file to Diversified Reporting Services, Inc. and ordered a transcript.
4. A true and correct copy of the transcript of video file A Better Financial Plan Ideal Investment Video is attached as Exhibit A hereto.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed on this 21st day of July 2020.

Raynalda Milord
RAYNALDA N. MILORD

1 UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2

3 In the Matter of:)

4) File No. FL-04188-A

5 UNITED FIDELIS GROUP)

6

7 SUBJECT: A Better Financial Plan Ideal Investment

8 Video

9 PAGES: 1 through 11

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16 AUDIO TRANSCRIPTION

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24 Diversified Reporting Services, Inc.

25 (202) 467-9200



1 P R O C E E D I N G S

2 MR. VAGNOZZI: Dean Vagnozzi, President of A
3 Better Financial Plan. In a minute, I'm going to
4 introduce you to what I feel is the single, most
5 versatile financial product in existence, and why you
6 need to make it 25 to 50 percent of your long term
7 retirement portfolio. And, I will be shocked if you
8 don't agree with me by the time this short video is
9 over.

10 To truly appreciate how good this investment
11 is, you need to first compare it to the
12 characteristics of the ideal investment. I've asked
13 hundreds of people over the past several years to name
14 the characteristics of the ideal financial vehicle,
15 and without question, everyone, for the most part,
16 says the same thing.

17 People want an investment that is safe from
18 loss, provides good growth, is liquid, and is tax
19 free. Hopefully, you'll agree that any investment
20 that has all four of these characteristics would be
21 ideal.

22 In fact, if you found an investment that had
23 all those characteristics, you would likely put the
24 majority of your money into it. Is the 401K or IRA
25 the ideal investment?

1 Well, it must be because all the financial
2 experts tell you that it's the first place you should
3 put retirement dollars into. And it's where most
4 people have the largest chunk of their nest egg.
5 Let's take a closer look.

6 Is your 401K or IRA safe from loss? How'd
7 it do in 2008? Most 401Ks and IRAs lost 30 to 50
8 percent, so no, a 401K or IRA is not safe from loss.
9 Does it have good growth? Well, let's say it does
10 sometimes.

11 You see, the misleading fact that we've all
12 heard is that the stock market has a 100 year track
13 record of earning eight to ten percent. That's true.
14 But, who do you know that has a 100 year time horizon
15 to invest their money?

16 Most people have a 10, 20, or 30 year time
17 horizon when it comes to investing money. And there
18 are plenty of 10, 20, or 30 year segments of time that
19 the stock market has been flat. Sure, since the crash
20 of 2008, the market is up about 20 percent a year.
21 That's terrific.

22 But, if you take a look at how the market's
23 done since 2000, which includes the three year
24 correction from 2000 to 2002 and the crash of '08, the
25 market is up only about four percent, which is a far

1 cry from the eight, nine, or ten percent you
2 anticipated. So again, the 401K or IRA passes the
3 good growth test sometimes.

4 How about liquidity? Is your 401K or IRA
5 liquid? Absolutely not. Your money is locked up for
6 20 to 30 years. In fact, it might be the most
7 illiquid financial vehicle in existence.

8 Lastly, how about taxes? A 401K and IRA are
9 tax deferred, not tax free. And since most people
10 feel that taxes are going higher in the future, a tax
11 deferred 401K or an IRA might be the most tax
12 inefficient vehicle in existence. So, there you have
13 it. The 401K and IRA fail three out of the four
14 characteristics of the ideal investment.

15 Now, perhaps you're saying to yourself,
16 "But, wait a minute Dean. I get a match with my 401K.
17 That's free money." Well, in my very strong opinion,
18 if, in order to get 20 cents out of you, I'd have to
19 take my dollar along with your 20 cent match and lock
20 it up for 20 to 30 years in a financial vehicle that
21 fails three out of the four characteristics of the
22 ideal investment, no thanks.

23 You can do better, a lot better. Let me
24 introduce you to the only financial vehicle in the
25 world that is safe, delivers good growth, is liquid,

1 and the money can be accessed tax free. And it's
2 called indexed universal life insurance. Please do
3 not confuse this with whole life insurance or variable
4 life insurance, and please, do not confuse this with
5 an indexed annuity.

6 The name again is indexed universal life
7 insurance, or IUL for short. And I'm going to quickly
8 introduce it to you now, using the annual policy
9 statement of a 72 year old client of mine. His name
10 is Phil.

11 Okay. The first thing I want to bring your
12 attention to is how Phil is 72 years old at the time
13 that this annual life insurance statement was issued.
14 How do we prove that. Well, you can see that Phil was
15 61 years old back in 2006. Well, it's 2017 at the --
16 when this policy statement was issued, so you can do
17 the math, and he's now 72 years old.

18 Why I'm using this is because if this makes
19 sense, which it will, for a 72 year old, it is a
20 no-brainer if you're 65, if you're 55, if you're 40,
21 if you're 35. And if you're in your 20s, you
22 absolutely positively have to start putting money into
23 this vehicle, as you'll see.

24 So, if it's a no-brainer for a 72 year old,
25 you get the idea. Phil had \$313,000.00 in this policy

1 at the beginning of last year, which very key is, he
2 put no premium into the policy. You see the big fat
3 zero there.

4 See, to think that you have to pay money
5 into life insurance every single year is not true. He
6 earned, as it says, interest credited. His
7 \$313,000.00 earned \$66,717.00. That is about a 21
8 percent return on his money. That, all by itself,
9 blows the smithereens, the notion that life insurance
10 is too conservative.

11 Again, whole life insurance is too
12 conservative. Universal life is too conservative.
13 Indexed universal life can get fantastic returns, as
14 this statement proves all by itself. In short,
15 indexed universal life allows the policyholder to get
16 the majority of the stock market gains with zero of
17 the downside risk.

18 So, if you make \$66,000.00 in a taxable
19 investment, depending on where your tax bracket falls
20 into, you are going to pay anywhere from \$15,000.00 in
21 taxes to say \$25,000.00 in taxes, maybe even higher.
22 And you'd be happy to pay that because you just made
23 \$66,000.00.

24 Phil didn't have a tax bill. And I will
25 refer to, and I will reference, Section 7702 of the

1 Internal Revenue Code. Phil has no tax obligation on
2 those \$66,000.00 gains. But, what he does have are
3 insurance-related fees. And everybody gets up in arms
4 about the insurance fees.

5 And traditional advisors will tell you the
6 insurance fees are high. They can be high if the
7 policy is designed improperly, which we'll talk about
8 in a second. But, look at what the insurance-related
9 fees are for Phil, this 72 year old man.

10 He pays \$1,407.00 in cost of insurance, and
11 he has expense charges of \$90.00, for a total cost of
12 \$1,497.00 in expenses. That's it. This 72 year old
13 man doesn't have to pay \$20,000.00 in taxes, but he
14 does have to pay \$1,497.00 in fees.

15 So, let me ask you. What would you rather
16 pay? \$1,400.00 in fees, insurance-related fees, or
17 \$20,000.00 in taxes? Of course, that's a no-brainer.

18 So, how does Phil earn his \$66,000.00?
19 Let's go to page two. Fifty percent of his money was
20 tied to the S&P 500 and you can see how he earned
21 16.82 percent. And 50 percent of his money was tied
22 to the NASDAQ 100. He earned 25.84 percent. So
23 again, this blows the smithereens, the notion that
24 life insurance is too conservative.

25 No, it is not. The right kind of policy is

1 not too conservative. Again, indexed universal life
2 is the right kind of policy.

3 How is this all made possible? We go to
4 page three. Look at the death benefit on page three
5 in the upper right-hand corner.

6 Phil has a \$546,875.19 death benefit. Who
7 the heck gets a death benefit down to the penny like
8 that? Well, if you're right with an advisor that
9 knows how to properly design these that benefits
10 you -- meaning that when you buy life insurance, do
11 you realize for your money, you could pick the highest
12 death benefit or the lowest death benefit.

13 We want you to get the lowest death benefit,
14 the smallest death benefit that the IRS will allow you
15 to have that would still classify this policy as life
16 insurance. See, advisors, people who sell life
17 insurance, our commission is based on the size of the
18 death benefit.

19 So, most advisors want you to get the
20 highest death benefit because the commission is the
21 biggest. But, what's in your best interest is to tell
22 that advisor, or that agent, to make the death benefit
23 as low as possible. By doing so, what happens?

24 By making it as small as possible, down to
25 the penny, like I did here with Phil, you're going to

1 get the smallest fees. The smaller death benefit,
2 smallest fees are associated with that.

3 So, there you have it. You have a 72 year
4 old man who didn't have to pay \$20,000.00 in taxes.
5 He had \$1,500.00 or less in fees. He made 21 percent
6 on his money, and this money is completely liquid,
7 completely liquid to him.

8 So, we hope you found this quick
9 introduction to indexed universal life compelling.
10 We're proposing that you put 25 to 50 percent of your
11 long term savings into indexed universal life.

12 We strongly encourage you to forward this
13 video onto your accountant, your attorney, another
14 advisor, or anyone in general that you think knows
15 their stuff when it comes to personal finances. We
16 challenge anyone to put in writing why you shouldn't
17 make IUL a large portion of your financial plan.

18 If somebody won't put in writing why you
19 shouldn't get your own IUL policy, then their opinion
20 doesn't count. The purpose of this video is not to
21 make you an expert on how indexed universal life
22 works.

23 It's simply meant to introduce you to it,
24 and show you some of the compelling features that will
25 cause you to want to pick up the phone and reach out

1 to the advisor that sent you this video. This advisor
2 is somebody that understands how indexed universal
3 life works, the best insurance companies to work with,
4 and the best way to tailor one of these policies for
5 you, your spouse, or your kids.

6 The advisor can provide with you additional
7 videos and a copy of my book, "A Better Financial
8 Plan: How to Significantly Improve Your Finances
9 Without the Help of Wall Street". The videos and my
10 book are designed to provide a more comprehensive look
11 at how IUL works and why you should make it a piece of
12 your portfolio. Thanks for watching.

13 (End of video file.)

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TRANSCRIBER'S CERTIFICATE

I, Ann Dooley, hereby certify that the foregoing transcript is a complete, true and accurate transcription of all matters contained on the recorded proceedings in the matter of:

A Better Financial Plan Ideal Investment Video

Ann Dooley

Transcriber

DECLARATION OF VICTORIA JACOMEIN

Pursuant to 28 U.S.C. Section 1746, the undersigned states as follows:

1. My name is Victoria Jacqmein. I am over twenty-one years of age and have personal knowledge of the matters set forth herein.
2. I am a Paralegal Specialist at the U.S. Securities and Exchange Commission (the "Commission").
3. Attached as Exhibit A is a true and correct copy of a document that appears in the Commission records and that was produced to the Commission by A Better Financial Plan in response to a subpoena in the Commission matter *In re A Better Financial Plan* (NY-9593).
4. Attached as Exhibit B is a true and correct copy of the cover letters from counsel for A Better Financial Plan that accompany its production to the Commission.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed on this 21st day of July 2020.

Victoria A. Jacqmein
VICTORIA JACOMEIN

Confidential Treatment Requested by a Better Financial Plan

From: Michelle Price [/O=CHOST/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICHELLE2C0]
Sent: Friday, July 06, 2018 3:11:28 PM
To: Alexis Abbonizio
CC: Dean Vagnozzi; perry@parfunding.com; ABFP Processing; Mike Tierney
Subject: 7/10/18 NOTE
Attachments: image001.png

Alexis,

Below are the numbers for the 7/10/18 notes:

Fund Name	Signer	Note Amount
ABFP INCOME FUND LLC	Dean Vagnozzi	461,000.00
LWM Income Fund LLC	David Gollner	476,000.00
Mariner MCA Income Fund LLC	Daniel Reisinger	835,000.00
RE Income Fund LLC	John Gissas	300,000 possibly- paperwork incomplete
Wellen Fund I	Joe Gassman	651,000.00

Thanks,
Michelle



Michelle Price
 Controller
[Abetterfinancialplan.com, llc](http://Abetterfinancialplan.com)
 234 Mall Blvd, Suite 270
 King Of Prussia, PA 19406
 O: (484) 425-7393
 F: (610) 910-3920





Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

John W. Pauciulo, Esquire
jpauciulo@eckertseamans.com
(215) 851-8480 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

August 10, 2017

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP000001-BFP000521 and marked “Confidential Treatment Requested by A Better Financial Plan”. These documents are in response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8480.

Very truly yours,

A handwritten signature in black ink that reads "John W. Pauciulo".

John W. Pauciulo

JWP/mzg

Enclosures

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
David M. Laigaie, Esquire (*cover letter only -- via Electronic Mail*)





Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

September 6, 2017

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov and
FEDEX

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC ("BFP") in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP000522-BFP004019 and marked "Confidential Treatment Requested by A Better Financial Plan". These documents are in further response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8480.

Very truly yours,

A handwritten signature in cursive script, appearing to read "D. Laigaie".

David M. Laigaie

DML/mzg

Enclosures

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
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Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

September 12, 2017

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov and
FEDEX

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC ("BFP") in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP004020-BFP004644 and marked "Confidential Treatment Requested by A Better Financial Plan". These documents are in further response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8480.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. Laigaie".

David M. Laigaie

DML/tk

Enclosures

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
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dlaigaie@eckertseamans.com
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(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

October 3, 2017

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov and
FEDEX

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed is CD which contains documents which are bates-stamped BFP004645-BFP011507 and marked "Confidential Treatment Requested by A Better Financial Plan". These documents are in further response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8480.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. Laigaie".

David M. Laigaie

DML/tk

Enclosures

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
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FOIA Confidential Treatment Request

October 16, 2017

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov and
FEDEX

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC ("BFP") in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP011508-BFP024314 and marked "Confidential Treatment Requested by A Better Financial Plan". These documents are in further response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8480.

Very truly yours,

A handwritten signature in cursive script, appearing to read "D. Laigaie".

David M. Laigaie

DML/tk

Enclosures

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
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50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

October 30, 2017

**VIA ELECTRONIC MAIL
ENF-CPU@sec.gov and
FEDEX**

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC ("BFP") in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP024315-BFP055313 and marked "Confidential Treatment Requested by A Better Financial Plan". These documents are in further response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8480.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML/tk

Enclosures

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

August 24, 2018

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP055314-BFP062503 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on BFP, dated July 17, 2018.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie". The signature is fluid and cursive.

David M. Laigaie

DML:dr

cc: Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

November 13, 2018

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP065773-BFP067461 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in further response to the subpoena served on BFP, dated October 22, 2018.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



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David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
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FOIA Confidential Treatment Request

December 12, 2018

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission (“SEC”).

Enclosed are documents which are bates-stamped BFP067462-BFP088412 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in further response to the subpoena served on BFP, dated October 22, 2018, and pursuant to recent communications between this firm and the SEC.

Below is a chart indicating the bates-ranges associated with each type of document produced.

Document Type	Bates Range
Contacts (Microsoft Outlook)	BFP067462 – BFP072486
Grasshopper Voice Recordings	BFP072487 – BFP086438
Radio Advertisements; Response Cards; CRM Contact Information	BFP086439 – BFP088412

December 12, 2018
Page 2

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink, appearing to read "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
Kimberly A. Yuhask, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)

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Eckert Seamans Cherin & Mellott, LLC
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Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

February 5, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission (“SEC”).

Enclosed are documents which are bates-stamped BFP088413-BFP088434 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on Eckert Seamans Cherin & Mellott, LLC, dated January 22, 2019, and pursuant to recent communications between this firm and the SEC.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML/tk

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

February 8, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission (“SEC”).

Enclosed are documents which are bates-stamped BFP088435-BFP088479 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on Eckert Seamans Cherin & Mellott, LLC, dated January 22, 2019, and pursuant to recent communications between this firm and the SEC.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D. Laigaie". The signature is fluid and cursive.

David M. Laigaie

DML/tk

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
Kimberly A. Yuhas, Esquire (*cover letter only -- via Electronic Mail (yuhask@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

March 22, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP089880 - BFP090164 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on BFP, dated October 22, 2018.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

April 5, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP090565 - BFP090583 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on BFP, dated October 22, 2018.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
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David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

April 11, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP002494 - BFP002498, BFP002620 - BFP002624, BFP002850 - BFP002854, BFP003009 - BFP003017, BFP003055 - BFP003063, BFP003571 - BFP003575, BFP003621 - BFP003635, and BFP090584 - BFP090598 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in further response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

April 18, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP090601 - BFP090868 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

David M. Laigaie, Esquire
dlaigaie@eckertseamans.com
(215) 851-8386 (Telephone)
(215) 851-8383 (Telecopy)

FOIA Confidential Treatment Request

April 18, 2019

VIA ELECTRONIC MAIL
ENF-CPU@sec.gov

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

Re: In the Matter of A Better Financial Plan, LLC (NY-9593)

Dear Sir/Madam:

This firm represents A Better Financial Plan, LLC (“BFP”) in connection with certain matters including the formal investigation being conducted by the New York Regional Office of the United States Securities and Exchange Commission.

Enclosed are documents which are bates-stamped BFP090601 - BFP090868 and marked “Confidential Treatment Requested by A Better Financial Plan.” These documents are in response to the subpoena served on BFP, dated July 20, 2017.

If you have any questions, please contact me at (215) 851-8386.

Very truly yours,

A handwritten signature in blue ink that reads "D Laigaie".

David M. Laigaie

DML:dr

cc: Megan R. Genet, Esquire (*cover letter only -- via Electronic Mail (genetm@sec.gov)*)
John W. Pauciulo, Esquire (*cover letter only -- via Electronic Mail*)

DECLARATION OF RAYNALDA N. MILORD

Pursuant to 28 U.S.C. Section 1746, the undersigned states as follows:

1. My name is Raynalda N. Milord. I am over twenty-one years of age and have personal knowledge of the matters set forth herein.

2. I am a Senior Paralegal Specialist at the U.S. Securities and Exchange Commission (the "Commission").

3. The Commission received video file A Better Financial Plan Unbranded Video. As part of my duties at the Commission, I sent this video file to Diversified Reporting Services, Inc. and ordered a transcript.

4. A true and correct copy of the transcript of video file A Better Financial Plan Unbranded Video is attached as Exhibit A hereto.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed on this 22nd day of July 2020.


RAYNALDA N. MILORD

1 UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2

3 In the Matter of:)

4) File No. FL-04188-A

5 UNITED FIDELIS GROUP)

6

7 SUBJECT: A Better Financial Plan Unbranded Video

8 PAGES: 1 through 52

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10

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15 VIDEO TRANSCRIPTION

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22

23

24 Diversified Reporting Services, Inc.

25 (202) 467-9200



1 P R O C E E D I N G S

2 MR. VAGNOZZI: Hi. Dean Vagnozzi, President
3 of A Better Financial Plan, and I appreciate taking
4 time here to go through a presentation that I think is
5 going to do probably more to improve your finances
6 than anything I else I can share with you. I can't --
7 I can't stress that enough.

8 If you are somebody in your 30s, 40s, 50s,
9 and you are saving for retirement, you need to take a
10 hard look at -- hard look and focus on what we're
11 going to cover here, because I believe traditional
12 planning -- and when I say traditional planning, I
13 mean contributing to a 401K or IRA, doing what
14 everybody else is doing -- is severely flawed. And
15 you need to learn why, and how to potentially redirect
16 some of your savings.

17 If you are somebody that is at, or real
18 close to retirement, or early retirement, somebody in
19 your late 50s, early 60s, even your late 60s, you need
20 to again, listen to the contents here. I'm going to
21 show you how to position your money in such a way that
22 you're going to be able to spend a whole lot more with
23 a lot less risk.

24 And again, to be able to spend and enjoy
25 your money, which, let's face it, that's the goal.

1 So, stay with me. I promise you're going to learn a
2 lot here. It's all centered around the contents of my
3 book, "A Better Financial Plan: How to Significantly
4 Improve Your Finances Without the Help of Wall
5 Street". I wrote this book recently to -- again,
6 to -- as a roadmap to help people improve the
7 efficiencies of their finances.

8 This is not about con -- the contents of
9 this book is not about comprehensive planning. I
10 would have to sit with you and know everything about
11 your finances before I can give you some
12 recommendations.

13 But, what the content of this book is
14 designed to do, and the content of the presentation
15 which I'm about to walk you through, is if you can
16 make one financial move, if you only can make one move
17 to improve your finances, to get more out of your
18 retirement savings, it's going to be what we cover
19 here. It's the content of the book.

20 I believe that the strategies we're going to
21 cover, and implementing them, and adding one specific
22 investment vehicle to your portfolio will do more to
23 improve your finances than anything else you can do.
24 And I'm about to prove it to you. So, let's get into
25 it.

1 I want to ask you a simple question. Who do
2 you want to be, Couple A or Couple B here? Everybody
3 laughs when they see this. The overwhelming majority
4 of people want to be Couple B. Very few people want
5 to be Couple A, meaning that, if I had to give you a
6 choice, do you want to grow your money to spend and
7 enjoy it, or is your plan to leave the majority to
8 your kids and grandkids?

9 Look. I have four children and I intend to
10 leave my kids a lot of money, but only what me and my
11 wife are done with. Most people agree with that
12 statement. So, I know you want to do both.

13 And by the way, before I forget, I'm
14 speaking today. I'll be speaking in a presentation
15 that -- it may be more centered towards a married
16 couple, okay? You might get the most benefit looking
17 at it from the eyes of a married couple.

18 Again, you want to -- I want you to be able
19 to spend your money, leave some to your kids. But, if
20 you had to pick, most people choose yourself and your
21 spouse before leaving a ton of money to your kids.
22 Okay? So, with that in mind, I believe that most
23 people are on a path to become Couple A instead of
24 Couple B, and let me prove it to you.

25 Most people today -- the number one fear of

1 seniors is not death. You've probably all heard this.
2 It's outliving your money. Let me prove that most
3 people are going to be Couple A, and that is living
4 frugally.

5 Let's say you've got a million bucks.
6 You've got \$1 million. That money has to last until
7 when? It has to last until death, not just your
8 death, but the death of you and your spouse. And the
9 dilemma is, we don't know when that's going to be.

10 What most people do is live off the
11 interest. We've been told by traditional planners,
12 "Hey, you don't want to outlive your money, so you
13 live off the interest." So, again, let's assume
14 you're 65 years old. You don't know when you're going
15 to die, so you and your spouse are going to die, so
16 you're going to live frugally, and you're going to
17 have your money last until, say 90-95 years old.

18 What do you have to worry about? You have
19 to worry about inflation, taxes. You've got to worry
20 about interest rates going up or down, losing money
21 based on investments. All these things are what keep
22 you up at night. So, the idea is though again,
23 develop a plan. Put a plan together that's going to
24 allow you to live off the interest.

25 So you -- up until now, up until retirement,

1 you were getting eight, nine, ten percent of your
2 money, or so you thought. But now, you're going to
3 live off a five percent return. Let's just target
4 five percent, a more conservative rate of return.

5 You've got a million bucks, and a five
6 percent rate of return on a million bucks spits out
7 what? It spits out \$50,000.00 a year. Okay. Not
8 bad.

9 But here's the question. Who's spending the
10 million? You? No. Your kids. Your kids are
11 spending the million. That means that you're Couple
12 A, right? You're not the, "Let's go spend the money."

13 You are living frugally for fear of
14 outliving it, so that means you're never going to
15 spend it. Your kids are going to -- when you pass
16 away, your kids are going to inherit the million.
17 Right? Poke a hole in that.

18 If you start spending the -- if you start
19 spending the principle of your million -- let's say
20 the first year you spend \$100,000.00 instead of 50.
21 Now, you're down to \$900,000.00. And the \$900,000.00
22 at a five percent rate of return is earning
23 \$45,000.00, not 50.

24 So, you're scared to spend your money and by
25 not having a plan to spend and enjoy your money,

1 you're forced to live more frugally than you could.
2 And, as a result, your kids are going to inherit all
3 of your money, and they're going to fly first class.
4 And I want you to fly first class, okay? So, we're
5 going to teach you how to solve that.

6 In fact, the -- this'll be the last slide of
7 this presentation. We are going to show you -- I'm
8 going to -- this presentation is going to show you how
9 to become safer. It's going to show you how to become
10 more liquid, pay less taxes, get higher returns on
11 your money, with no cash flow change.

12 Now, that's a bold accomplishment and I --
13 set of goals, I should say. And if we're able to
14 accomplish three of these five bullets, with no co --
15 with no increased risk or no cash flow change, I
16 assume you would want that, right?

17 So, be a doubter right now, but this will be
18 the last -- last slide that we go over, and wait till
19 you see how we do it. Okay. This is why you need to
20 again, take away all distractions from you. Turn off
21 your cell phone right now and focus on what I'm about
22 to cover, because I know that I'm going to be able to
23 significantly improve your finances by what we're
24 about to get into here.

25 So, the other thing I want to, I guess, pick

1 on with traditional planning, before I get into
2 solutions is, I need you to tell me what is the
3 characteristics of the ideal investment? If you can
4 design the perfect place to put your money -- see,
5 before you can poke holes in what I'm going to
6 suggest, let's first analyze, what are you doing with
7 your money? All right?

8 And let's analyze that by naming the ideal
9 investment. The ideal place for your money would be
10 something that is safe, something that is liquid, that
11 has good returns, and is tax free. Okay?

12 This would be ideal, right? I hope --
13 obviously, I can't hear what you're saying, but
14 hopefully, you would agree. If you could find
15 something that does all of this, that delivers safety,
16 liquidity, good returns, and is tax free, would you
17 want that as your portfolio? Of course, you would.

18 In fact, wouldn't you make that the key
19 foundation? You would want to put as much money into
20 this as you could, right? Of course, you would.

21 So, let's -- let's compare the
22 characteristics of the ideal place for your money with
23 what everybody else is doing with their money. And
24 that would be contributing money to a 401K or an IRA,
25 right?

1 Most traditional advisors, most magazines,
2 financial magazines or newspapers, they tell -- what
3 have you heard from every traditional planner? First
4 thing you should do with your money is put it into a
5 401K or an IRA, right? Well, let's compare the
6 characteristics of the ideal place for your money
7 compared to those two investments.

8 Is your 401K or IRA safe from loss? Of
9 course not. It's not safe from loss. How did it do
10 during 2008? Right? The stock market dropped 38
11 percent, so -- and so did everybody's 401K. So, it
12 fails that test, okay?

13 Is it liquid? Is your 401K liquid? Put
14 your money into a vehicle that you can't touch for 20
15 to 30 years. Right? That most -- it might be the
16 most illiquid place for you to put your money. Who
17 does that?

18 Go find me any successful, high net worth
19 individual who has started with -- from nothing and
20 made a fortune with their money, made a lot of money.
21 And they didn't do it by locking their money up for
22 20, 30, 40 years.

23 Yet, that is what the American public has
24 been told, "Put your money -- start in these 25, 30
25 years old, 35 years old. Put money in a vehicle

1 called a 401K or an IRA. You can't touch it till
2 you're 60," the most illiquid vehicle in the world,
3 and fails that test.

4 Does it have good returns? Does your 401K
5 or IRA deliver good returns? Well, I'll say
6 sometimes. What do I mean by sometimes?

7 You see, if you look at the time of this
8 recording, if you look at how the market has done,
9 through 2016, then end of 2016, the market was up
10 about 15 percent, the SNP 500, 15 percent a year, like
11 during that 94-month period. Since the market hit its
12 bottom in March of '09 through the end of 2016, the
13 SNP 500 is up about 15 percent a year. That's
14 terrific.

15 However, if you factor in 2008, and you
16 factor in 2000, 2001, and 2002, the market is only up
17 about 2.5 percent. So, here you have a 17-year window
18 where the market has done 2.5 percent, and you have an
19 8-year window and the market's up about 15. So, which
20 is it? I say -- so, the stock market, the 401K or the
21 IRA will pass the good rate of return test half the
22 time.

23 What I have here on the screen is 30 year
24 segments of the market. Why 30 years? Because the --
25 here's what you've heard, "Well, put your money into

1 the stock market because after all, the market's got a
2 100 year track record, right, of earning 8, 9, 10
3 percent." Have you heard that? Everybody's heard
4 that.

5 Here's the problem. Nobody listening to me
6 right now has a 100 year time horizon to invest their
7 money. Most people watching me have a 15, 20, 30, 40
8 year time horizon, not 100 years. And the market has
9 plenty of 20, 30, 40 year periods in time that it
10 hasn't moved.

11 Make -- let me make my point. It's on the
12 image you see on the screen right now. So, I measured
13 a bunch of 30-year segments, 1930 to 1959. That's a
14 30-year window. The S&P 500 earned 7.7 percent. 1935
15 to '65 --you get the idea -- 8.54 percent. Look at
16 the different rates of returns that we measured during
17 all these segments.

18 What is the -- see how we have a low of 4.19
19 percent, from 1945 to '74. We have a high of 11.83
20 percent, during the 30-year period from 1970 to 1999.
21 The point is, the market doesn't always earn 8, 9, 10
22 percent, and this graph here proves that.

23 The point is, the number one place you've
24 been told to put your money fails the good returns
25 test at least half the time. All right?

1 How about taxes? Do you want tax -- you
2 don't want tax deferred money. Your 401K and IRA is
3 tax deferred, but you want tax free. Okay?

4 Do you think taxes are going higher in the
5 future? Of course, you do. At the time of this
6 recording, we have a 20 trillion, with a t, trillion
7 dollar deficit. Of course, taxes have to go higher.
8 It's just a matter of when. We all know that. They
9 have to go higher. The government has to give you
10 less and tax you more.

11 So, it's not a matter of if taxes go higher.
12 It's when. But again, your 401K and IRA, you're not
13 paying taxes today. You're paying taxes down the
14 road, when you think they'll be higher. That makes
15 zero sense.

16 But, some of you may be saying, "Well, wait
17 a minute. I won't be working, and I'll be in a lower
18 tax bracket." Let me -- let me just squash that right
19 now. If you are in a lower tax bracket when you
20 retire, that only means one thing. That means you
21 have failed financially.

22 You have either not saved enough money, or
23 the money you have saved has not performed well.
24 Let's put a financial plan together designed to be in
25 a lower tax bracket when you get older. That makes

1 zero sense.

2 I've got a better idea. Let's put a
3 financial plan together designed for you to be in a
4 higher tax bracket when you get older. That's a plan
5 for success. How you deal with the taxes, how you --
6 how you offset them, or what you do to plan around
7 them, that's where I'm going to help you -- to help
8 you achieve.

9 But, to put -- to defer taxes to a time when
10 you think you'll be in a lower tax bracket makes zero
11 sense in the world. Zero.

12 Here's the other thing. "Well, Dean. Wait
13 a minute. My company gives me match -- a match.
14 That's free money." That's free money. Well, my
15 opinion: if in order to get 20 cents out of an
16 employer, if I've got to put a dollar to get 20 cents
17 out of an employer to put it into a vehicle that's not
18 safe, that's not liquid, that's not tax free, and it
19 provides good returns only some of the time, no
20 thanks. I don't want the match. Okay?

21 Now, if you -- if you want to put enough
22 money into your 401K or IRA to get the match, okay. I
23 can understand that. That I can at least understand.
24 Most people, however, are putting over and above the
25 match. They're putting three or four times what they

1 need to get the match.

2 All of that money again, is not saved, not
3 liquid, getting good returns half the time, and again,
4 failing the tax free test. I personally would never
5 put any of my money into a vehicle that -- that --
6 that again, fails all of these. There's a better way
7 and I'm going to show you how, so let's get into it.

8 So, what vehicle does all of this? So,
9 before I tell you what does it all, make your mind up
10 right now. Right now. If I can show you what does
11 all of this, and I'm -- and I can prove it to you, do
12 you want it? Please, say yes.

13 What does all of this is a product called
14 indexed universal life insurance, not to be confused
15 with whole life, not to be confused with variable
16 life, or universal life, or an indexed annuity. Okay?
17 They -- they're similar.

18 This is a product called indexed universal
19 life insurance, and you need to add it to a
20 significant piece of your portfolio. And I don't care
21 what age you are, all right? The sooner the better.

22 And I'm going to prove to you, over the next
23 several slides, that it's safe. It's liquid. It's
24 got good returns, and it can provide your money tax
25 free. And it's going to significantly enhance your

1 retirement plan. Let me show you how.

2 You first -- to appreciate how indexed
3 universal life works, I need to give you a quick life
4 insurance 101 tutorial. Most people have heard of
5 term insurance. I'm going to show you how life
6 insurance has evolved.

7 You've all heard of term insurance. Term
8 insurance is cheap. It's good if you die young, but
9 statistically, it's a waste of money. Now, what does
10 that mean?

11 Let's say you're a 45 year old male. You go
12 out and you buy \$1 million of life insurance. It's
13 going to cost you \$1,400.00, \$1,456.00 for a preferred
14 rating for 20 years, okay? And at age 66, you're
15 going to get a bill from the insurance company. And
16 most people don't see this bill until it comes. They
17 don't look 20 years out.

18 But, at 66 year old -- at 66, the insurance
19 company sends you a \$38,000.00 bill to keep this \$1
20 million term insurance policy. Guess how many years
21 that \$38,000.00 covers? One year, okay? So, what do
22 people do when you get a \$38,000.00 bill for one year
23 of coverage? You drop the policy.

24 You start thinking to yourself, "Oh. Well,
25 who needs the life insurance? I've got money in the

1 bank. My kids are grown. Who needs it?" Okay? So,
2 you let it lapse. And guess what? There's where the
3 insurance company makes all their money, because 95
4 percent of the public, this is what they own.

5 And one in 2,000 term policies pay out
6 because statistically, you're going to pass away in
7 your late 70s, early 80s. And you will -- you will
8 never pay those premiums to keep this policy. This
9 is -- this is the money maker for the insurance
10 industry. That's term insurance.

11 Now, I'm not saying you shouldn't have it.
12 You've got kids to protect. You've got a spouse to
13 protect. For business reasons, you need the coverage.
14 By all means, most people don't have enough of this.
15 But, I'm just saying, statistically, term insurance is
16 a waste of money.

17 That brings us to whole life insurance.
18 Whole life, up until 1982, was the only cash value
19 life insurance policy. Okay? So, it costs ten times
20 the amount that term insurance costs. And, by the
21 way, I'm not trying to be exact with these. I'm just
22 estimating. It's a lot more money than term
23 insurance.

24 But, what happens is, you have a cash that
25 builds up. Cash value builds up in the policy. And I

1 want you to go look this up on your own. Section 7702
2 of the Internal Revenue Code deals with the cash value
3 within these policies.

4 Life insurance, the life insurance -- the
5 death benefit of life insurance is income tax free.
6 And the cash within the policies can be accessed tax
7 free using policy loans, which I'll talk about a
8 little bit. But, I refer to whole life insurance as
9 the VCR of the insurance industry.

10 Our VCRs, let's face it. We -- some of
11 you -- I think I have one, in my basement somewhere,
12 and under a bunch of dust is a VCR that's 30 years
13 old. If I plugged it in, it probably still works.
14 But, we don't want to use a VCR anymore, right? We
15 want to -- we want the blue ray DVD. We want to
16 stream our video. Okay?

17 Whole life is an older, I believe, life
18 insurance policy that's -- that's -- its time has
19 passed. Your money grows. It grows -- your money
20 grows based on the profits of the insurance company.
21 Okay? It's a non-disclosed product, in that you have
22 no idea what your fees are, what charges are. You
23 have no idea what's causing your money to grow. And
24 who wants that?

25 Do you want a product that has -- that the

1 fees are disclosed or non-disclosed? Of course, you
2 want fees that are disclosed. All right? Well, whole
3 life is not that. It still exists, but again, I think
4 it's an outdated product.

5 Whole life -- life insurance in general has
6 a bad reputation. And one of the reasons why -- it's
7 always been referred to as a -- as a bad investment.
8 Why? 1979. Here's a screenshot from the -- a federal
9 press release from the Federal Trade Commission saying
10 that, "Buyers of whole -- buyers and holders of whole
11 life insurance are losing billions of dollars a year,"
12 says the Federal Trade Commission.

13 This -- this press release, the 100-page
14 document, this study they did, multiyear study, was a
15 black eye to the insurance industry. And to this day,
16 the insurance industry has a bad reputation because
17 of -- this is the main reason why.

18 They have come out with much better products
19 as a result, which you'll learn about. But, it's a --
20 it's a public relations nightmare for them that they
21 still, I don't think, have fully recovered from.

22 1982, universal life is introduced. This is
23 the insurance industry's way of coming out with better
24 products. Universal life is considered a disclosed --
25 a fully disclosed product. You now know, with the

1 introduction of universal life in 1982, you know what
2 the fees are. You know the loads, the charges.

3 All the fees are disclosed, and your money
4 grows with interest rates. What were interest rates
5 in 1982 when this came out? Interest rates were 12
6 percent, 13 percent, 14 percent, so this was viewed as
7 a big improvement on conservative whole life.

8 You could put money into these universal
9 life policies. Interest rates are growing at 13-14
10 percent, and your money would do very well. What
11 happened to interest rates though? Interest rates, at
12 the time of this recording, are pretty much
13 nonexistent.

14 So, universal life at the time was viewed as
15 an outstanding improvement to whole life. Today, not
16 so much, because interest rates are so low these
17 policies are not earning much at all.

18 By the way though, Section 7702 of the
19 Internal Revenue Code applies to universal life as
20 well. Again, it's the same tax free death benefit
21 qualities with universal life as whole life.

22 The 90s, variable life was introduced, and
23 it's in red in my diagram here for a reason. Variable
24 life meaning that it's the -- the cash, the growth of
25 your cash value, is tied to mutual funds, and the

1 stock market in general. Just like you can pick a
2 bunch of mutual funds in a 401K or an IRA, you can
3 pick a bunch of mutual funds with variable life.

4 You put in a dollar -- when you put money
5 into whole life, or universal life, or variable
6 life -- I want to get this out in the open right now.
7 You put in a dollar. Your dollar becomes 85 cents day
8 one because that -- the difference is paying for the
9 fees. Okay?

10 The fees -- let me just whet your appetite
11 now. The fees, as I will prove to you, are less than
12 taxes over time. Okay? That's why you need to -- you
13 need to add this to your portfolio.

14 But, be real clear. The first thing that
15 happens, the fees come out to pay for the insurance
16 costs. Now, that 85 cents, after the insurance fees,
17 grows. With universal life, it grows with interest
18 rates. With variable life, it grows with mutual funds
19 that you pick.

20 Now, this came out in the 90s. And what was
21 every mutual fund doing in the 90s? It was growing by
22 20-30 percent. Look -- think of all back during the
23 90s, if you can remember back that far. The stock
24 market was on a tear.

25 So, at the time, when this was introduced in

1 the 90s, this was viewed as a major improvement on
2 whole life or universal, because the market was doing
3 so well. But, what was the problem with variable
4 life?

5 When 2000 rolled around and the stock market
6 started crashing for three years, not only did you --
7 you didn't earn anything, but you started losing your
8 cash value. Okay? Again, variable life is in red for
9 a reason because I don't like it even a little bit.

10 Life insurance needs to be a pillar of
11 strength in your retirement portfolio, and that's why
12 I don't like this. What -- and what can be a pillar
13 of strength if it can go backwards? That's what
14 variable life can do.

15 That brings us to indexed universal life.
16 The evolution of life insurance has brought us to what
17 I feel is the best, single best life insurance product
18 on the market, and not just life insurance product,
19 but place for you to accumulate wealth. I believe it
20 should be 25 to 50 percent of your portfolio, again
21 based on your age and your income and all that stuff.

22 But, you need to take a hard look at this.
23 Indexed universal life was introduced in the early
24 2000s. And what they did is, they took the sizzle
25 with variable life, and they con -- made it a little

1 bit more conservative, took some of the more
2 conservative features of universal life and whole
3 life, and they -- you put your money in.

4 Your money -- again, the same fees come out.
5 Your dollar becomes 85 cents. But now, that 85 cents
6 grows with an index, like the S&P 500. And as you see
7 here, you have a cap and a floor.

8 And when I'm referencing an insurance
9 company that -- one of the insurance companies we work
10 with has a 13 percent cap and a zero percent floor,
11 what does that mean? So, if the S&P 500 earns 8
12 percent, your money in the policy will earn 8 percent.
13 If it turns to 12 percent, you get 12.

14 If it earns 27 percent, your capped, in this
15 example, at 13 percent. However, if the stock market
16 drops 38 percent, like it did in '08, you don't lose
17 38 percent. You have a floor of zero.

18 So, your money is contractually guaranteed
19 by multimillion and billion dollar insurance companies
20 that offer this product, not to go backwards during a
21 stock market decline. Hopefully, I've got your
22 attention.

23 Now, let me give you a glimpse -- and again,
24 my book has plenty of examples. I'm just going to
25 show you a couple examples. Let's compare how the

1 stock market has done in the past, how it actually
2 performed comparing it to how it would have performed
3 with a cap and a floor, like indexed universal life
4 provides.

5 So, here, focus on 1945 through 1974. Here,
6 the S&P 500 earned, as you can see, 4.03 percent. If,
7 however, we could go back in time, and every year
8 where the market did better than 13 percent, you got
9 capped at 13. But, when the market declined, like it
10 did, for example, in 1946, instead of losing 11
11 percent, you would get zero.

12 Anything in between, like it did in 1949 --
13 in 1949, the market did 10.26 percent. Anything
14 between zero and 13 percent, you got whatever the
15 market actually delivered. But again, your gains are
16 capped and you're prevented from losing money with a
17 floor of zero.

18 Bottom line is, we go from a four percent
19 yield with the S&P 500 to a 6.97 percent yield, if we
20 had a ceiling of 13 and a floor of zero. Okay?
21 That's like a -- almost a 3 percent increase, right,
22 during the same period in time.

23 Let's take a look at another example.
24 Here's 1994 through 2013. You can see the S&P 500
25 earned 5.92 percent. Doing the same exercise, cap

1 yourself at 13, take away the negatives, you go from
2 5.92 percent to 7.78 percent. Again, almost an
3 increase of 2 percent a year during the same period in
4 time.

5 Remember the screenshot I showed you
6 earlier, where I compared the 30-year segments in
7 time, how the S&P 500 performed? Now, I want you to
8 compare each segment in time, each 30-year segment in
9 time. If we can go back and cap a -- give yourself a
10 cap of 13 percent. Give yourself a floor of zero.

11 Look at the column on the right and look
12 at -- there's one word that I want you to -- what one
13 word would describe all the rates of return on the
14 right-hand side? The word that everybody uses is
15 consistency. Look how consistent your returns are in
16 that column.

17 You're look for -- just about every -- 6.8
18 to 8 percent pretty much every single time, whereas
19 without a cap and a floor, you're all over the place.
20 The theme is, it's not about what you earn when it
21 comes to retirement planning. It's about what you
22 don't lose. Okay?

23 We can get some really attractive returns
24 with this product, with none of the market risk. And
25 again, think of your portfolio right now. How much of

1 your portfolio would you put into a vehicle that can
2 deliver consistent returns in the 6.5 to 8 percent
3 range? I bet you'd put a nice chunk of money there.

4 Would you put all of it? Of course not.
5 Right? But a whole lot more than nothing, right?
6 There's -- there's -- you've got to have something in
7 your portfolio that's not delivering consistent
8 returns like this. It's all about the cap and a
9 floor.

10 Now, I just explained how it worked. Now,
11 let me prove to you that it works using annual
12 statements that come from my clients that have owned
13 these policies for 10-15 years.

14 So, first thing I want to do is show you a
15 client's statement during the 2008 era, right?
16 2008 -- when I say 2008, most people, you know, they
17 cringe. Why? Because the stock market got crushed
18 and a lot of people, most -- probably you listening,
19 watching, probably lost a lot of money during that
20 period in time.

21 So, what I want to do is show you -- this is
22 a screenshot from the S&P 500, August 1st of '08. The
23 S&P 500, which you can look up -- they're online.
24 This is right off Yahoo finance -- was 1260 during
25 that date.

1 The S&P 500 -- we reference the S&P 500
2 because the S&P 500 has outperformed, I want to say,
3 almost 75 percent of all mutual funds, year in and
4 year out. Don't quote me on that exact percentage,
5 but it's a high percentage. The S&P 500 is the
6 benchmark everybody likes to compare their mutual fund
7 to.

8 There's where it was on August 1st. Again,
9 this is not the policy. This is -- this is what the
10 S&P 500 do. August 1st, it was 1260. Now, November
11 24, 2009, the S&P 500 was 1100, okay? So, this is a
12 16-month period that the market had dropped, right,
13 about 10 percent.

14 Now, it had fallen much lower than that,
15 okay, as you can see in this chart here. The S&P 500,
16 in March of '09, fell to 752, but then it rebounded up
17 to this November mark of 1100. All right? I'll tell
18 you why I'm com -- using November of '09 in a minute.

19 But, the point is, the stock market, the S&P
20 500, during this 16 year window, was down 9.78
21 percent. Okay? So, table that. Remember, down 9.78.
22 Let's compare one of my clients who had this policy
23 during the same 16-month window and let's see how he
24 did.

25 So, you can see on the right-hand side here,

1 August 1st of 2008, this is a client of mine whose
2 annual IUL, indexed universal life, statement came
3 out. He had, at the time of this statement,
4 \$133,933.00 in the -- in the policy. Look at the
5 death benefit, by the way. \$1.6 million.

6 You notice we're talking about life
7 insurance now for 15 minutes, and I haven't even
8 talked about life insurance, the death benefit. See,
9 we're not talking about this for the death benefit.

10 We're talking about this right now for the
11 cash value. Okay? Nobody understands how it works,
12 and you need to understand how powerful this tool is,
13 and how it can be used again, to enhance your
14 retirement.

15 So, this individual had \$133,000.00 of cash
16 inside the policy. Look how much money was put into
17 this policy over the next 12 months. Nothing. See,
18 whole life, older forms of life insurance needed to be
19 paid for every single year; not the case now.

20 With indexed universal life, as long as
21 there's enough money in the policy that can pay for
22 the internal insurance fees, you don't ever have to
23 make premium payments. Okay? So, I want to show you
24 that this client put no money into the policy.

25 Now this -- now, here we are, August 1,

1 2009. We're 12 months into a 16-month comparison.
2 And you can see the client went from \$133,000.00 down
3 to \$131,000.00. So, my client dropped his cash value,
4 dropped in value, about \$2,700.00.

5 Well, wait a minute, Dean. You just said
6 that the policy won't lose any money. It won't lose
7 any money based on the stock market. But, every
8 single year, the internal fees have to come out to pay
9 for the insurance costs, okay? But remember, let's
10 measure the next -- this is 12 months into a 16-month
11 comparison. So, he -- he took a temporary
12 \$2,500.00 -- \$2,600.00 decline.

13 Now, I used November in this example because
14 my client, this particular client lived right up the
15 street from me. And it was right before Thanksgiving.
16 I'll never forget it. He came down to my house. He
17 met me at my house. He didn't come to my office.

18 Met me at my house and right before he came
19 into my house, I pulled up his statement online. And
20 here you can see. Lower right-hand corner's the date.
21 November 24 of 2009. And you can see this is -- at
22 the top of the screen, you see that \$1.6 million death
23 benefit? This proves this is the same individual.

24 Look at his cash value now. On that date,
25 10 minutes before he comes in, I print out his current

1 policy cash values, and his cash has now grown, with
2 no contributions, to \$147,000.00. Let me remind you.
3 What did the stock market do during that same 16-month
4 period? It dropped almost 10 percent.

5 But here, my client with no contributions,
6 when from \$131,000.00 to \$147,000.00. How the heck
7 did that happen? I was amazed. When I saw this, it
8 stopped me in my tracks. I had to look at this. I'm
9 like, "How can that be?"

10 Here's -- what happened visually, when the
11 market dropped, as you see, when it plummeted down
12 to -- to its lows in March of '09, my client, as you
13 can see, took a temporary loss of 2,700 bucks. And he
14 went from 133 to 131.

15 But then, when the market started running,
16 the market started increasing, from March of '09. So,
17 by the time November rolled around, it -- because of
18 the inclines of the market, my client went from --
19 cash value went from \$131,000.00 to \$147,000.00 with
20 no contribution. It's all because he didn't fall.

21 He didn't -- his cash value didn't drop ten
22 percent. Right? It never took that 10 percent hit.
23 Again, the key to wealth accumulation, it's not about
24 what you earn. It's about minimizing what you lose.
25 And this policy was not impacted at all by the

1 decrease, the 10 percent drop in the stock market
2 during that period in time.

3 I hope -- I hope this grabs your attention.
4 Point is, if my client -- as we just proved to you, my
5 client had \$133,000.00. Sixteen months later, he had
6 \$147,000.00. That's a \$13,000.00 gain. That's a 7.27
7 percent rate of return increase.

8 If he had the same money in the S&P 500, he
9 would have lost almost 10 percent. His \$133,000.00
10 would have been worth \$117,000.00, which would have
11 been a drop of \$16,000.00. Right? That is a 17
12 percent increase, when you compare the two, with less
13 risk, less tax -- no tax actually, more family
14 protection. Remember, he had a \$1.6 million death
15 benefit. Right?

16 And so, if you think you're over-insured or
17 don't need the insurance. Guess what? Name a church
18 or some kind of charity as the beneficiary. Right?
19 But, this ain't about the death benefit. Nonetheless,
20 there is more family protection with the death benefit
21 than without it. And there's no cash flow change to
22 set up this policy.

23 Most people today are putting all their
24 money in one -- in say, their 401K. All we're saying
25 is, maybe stop putting all your money there. Take

1 some of your money and fall into one of these
2 policies.

3 Perhaps you have lump sums of cash laying
4 around, like this individual did. This individual
5 took some money he had sitting around in the bank,
6 sitting in mutual funds, that he wasn't happy with.
7 He transferred it over to the policy; no cash flow
8 change. All right? Hopefully, that grabs your
9 attention.

10 I haven't even -- I have an even better
11 example now that I'm going to show you. If I
12 mentioned to you a 69 year old man, cash value life
13 insurance, you think what? 69 year old and life
14 insurance in the same sentence, you think expensive.
15 Can't afford it. Doesn't need it. That's what you
16 think, right?

17 Well, I'm about to show you another client
18 who is 69 years old at the time we use this statement.
19 As you can see, he was 61. So, this is an individual
20 who took out this policy, indexed universal life. He
21 took this policy out on December the 18th 2006. As
22 you can see, he was 61 years old.

23 At the time that we do this comparison, this
24 annual statement came out on December the 17th 2014.
25 All right? He was 69 years old at the time this

1 annual statement came out.

2 Now, here's what I want to point out to you.
3 Look at the death ben -- this is page two of his
4 annual statement. Look at the death benefit. There's
5 only one number you need to focus on, and that's the
6 upper right-hand corner. He has a \$437,728.40 death
7 benefit.

8 Who the heck gets a death benefit for
9 \$437,000.00, down to the penny, like you see, down to
10 the 40 cents? Who gets that? Well, my clients do
11 because they're -- when it comes to buying life
12 insurance, there's two ways to buy life insurance.

13 You can get -- you -- see, most people
14 confuse life insurance with car insurance. See, when
15 you buy car insurance, for example, you want to give
16 the -- you want to give State Farm as little money as
17 you can to get the most auto insurance as you can.
18 Right? Just about every insurance is like that. You
19 want to pay as little premiums to get the most
20 coverage, right?

21 With cash value life insurance though, the
22 IRS lets you do it a different way. They will allow
23 you to get all this wonderful benefits, the tax-free
24 benefits. They will allow you to get the tax-free
25 withdraws of your money, so long as you -- it stays

1 within what's called the met guidelines.

2 There is a maximum death benefit you can get
3 for your money. But, the IRS also tells you, based on
4 what you put in, the smallest death benefit you can
5 get, to the penny -- that's why you see that here --
6 to the penny, the smallest death benefit, and have
7 this still be classified as life insurance.

8 Why is buying the smallest death benefit in
9 this example so important? It's important because we
10 want to minimize your fees. Even though I'm not
11 scared of the fees, because I'm going to prove to you
12 in this example that the fees, the insurance fees are
13 less than taxes, I also want to minimize them as best
14 I can. And we do that by minimizing the death
15 benefit.

16 And let me tell you this right now. Every
17 advisor that sells life insurance, we are compensated
18 on death benefit. We want your death benefit to be as
19 high as it can be.

20 So, if you go approach your life insurance
21 agent, and say you want the smallest death benefit,
22 you're cutting their -- you're cutting their
23 commission by two-thirds. But, that's okay because
24 it's in your best interest. If you care about the
25 cash value accumulation, then you want to minimize

1 that death benefit.

2 Hopefully, I've made my point, so I'm
3 showing this example. That's what we did for this 69
4 year old man. His death benefit is the smallest it
5 can be down to the penny. Let me keep going.

6 What's the other knock you hear on life
7 insurance traditionally? "Oh, it's too conservative."
8 Well, whole life was too conservative. Whole life was
9 too conservative. Universal life was too
10 conservative. Variable life, frankly, is too risky.
11 Indexed universal life delivers outstanding returns,
12 and let me prove it again. Here's another example.

13 So, this particular insurance company allows
14 you to tie your money to the S&P 500 and the NASDAQ
15 100. So, you can see my client put 50 percent of his
16 money to the S&P, 50 percent to the NASDAQ. Look how
17 he did the 12 previous months.

18 My client earned 8.39 percent on the money
19 tied to the S&P 500 and he earned 10.94 percent on the
20 money tied to the NASDAQ. That's fantastic, right?
21 And the dispels every negative, "Oh, life insurance is
22 too conservative."

23 Again, not indexed universal life. You can
24 get great returns. So, he's made terrific returns on
25 the money inside the policy. And he -- this

1 individual, as you can see, he put in \$28,500.00, and
2 he put it in halfway through the year.

3 And if you put it in halfway through the
4 year, the way this policy's written, the cash -- the
5 money sits there and earns 4.6 percent. It earns
6 whatever the stated interest rate is at the time at
7 the policy anniversary. And his 28 grand earned 4.6
8 percent, until the policy anniversary. Then, it all
9 goes to the index.

10 Bottom line is this. My client's money, in
11 the policy, as you can see, if you can add it all up,
12 my client made \$23,000.00 in gains in the policy,
13 \$23,726.00 in gains. Now, I've got a really, really
14 important question for you. This is an eye-opener.

15 If you make \$23,000.00 in some mutual fund,
16 okay, and let's say you're in a 20 percent tax
17 bracket. And this individual is in the highest tax
18 bracket you can get. But, let's just say it's 20
19 percent.

20 If you earned \$23,000.00 in a 20 percent tax
21 bracket, what do you owe the government in taxes? In
22 this example, let's just round it off to \$4,600.00.
23 Okay? You're at that example? \$4,600.00 in taxes.

24 Let's go back to page one. There is the
25 \$23,000.00 in gains and look at the next thing. Look

1 at his cost of insurance.

2 His insurance fees were -- and the expense
3 charge were \$2,002.00. So, everybody gets to get --
4 wants to get all upset about the insurance fees with
5 these policies. Absolutely, they're high. I wish
6 they were zero.

7 But, what would you rather have, \$2,000.00
8 in insurance fees, or \$4,600.00 in taxes? This is on
9 a 69 year old man. What if you're watching this and
10 you're -- and you're 45 years old, or you're 60 years
11 old, or you're 35 years old? Okay? If this makes
12 sense for this individual, it makes sense for pretty
13 much anybody that's younger than that.

14 You can't be scared of the insurance fees.
15 Insurance fees over time are going to be less than
16 taxes. Again, here is a perfect example, all the
17 proof you need.

18 And the key is making that death benefit as
19 low as we can. By lowering the death benefit, we
20 lower the fees. By lowering the fees, more money goes
21 to your gains, again, less erosion of your cash value.
22 Okay?

23 This here -- here's another example. Here's
24 another -- now, let me dispel another myth. As you
25 get older, people -- the mistake people think, as you

1 get older, your insurance costs go up.

2 We designed this policy the proper way. As
3 you get older, yes, your internal fees go higher as
4 you get older. But, because we're making the death
5 benefit as low as we can, and your cash over time is
6 going to -- your cash is going to increase faster than
7 your fees increase.

8 With life insurance -- follow this -- you
9 pay the difference between the death benefit and the
10 cash value. So, as your cash value is rising, your
11 actual insurance fees go down every year. That's
12 right. They go down.

13 Take a look at this example here. Here's a
14 client. As you can see, per month -- now again, this
15 was a very large insurance policy. The focus I want
16 you to pay attention to is, look how each month, and
17 say -- as this guy gets older each month, his fees are
18 actually getting lower. Put to bed, dispel every
19 misconception you ever heard.

20 This is a different product than whole life.
21 It's a different product than anything or other kind
22 of insurance you may have heard about. You need this
23 is as a piece of your portfolio.

24 I'm going to tie it all together here in
25 just a second. But again, your insurance fees should

1 reduce as your cash value increases.

2 One more -- one more point I want to make,
3 and then I'm going to tie the whole plan together.
4 Let's show how indexed universal life works as an
5 income stream to you during retirement.

6 Now here, I have an example. There's a lot
7 of columns here. I want you to focus on column one
8 through five for right now, just one through five.
9 This represents the stock market.

10 Let's say we can go to Vanguard, or let's
11 say you go to Merrill Lynch. Pick some advisor.
12 Let's say some advisor could guarantee you an eight
13 percent rate of return every year.

14 Let's say you're a 50 year old -- an
15 example. You're a 50 year old male in this example.
16 And somebody could guarantee you an eight percent rate
17 of return for your -- for the rest of your life. You
18 would take that all day long, wouldn't you? Of
19 course, you would.

20 Well, we've got to factor in taxes here,
21 because this is where the insurance policy's really
22 going to excel for you. Let's say you get an eight
23 percent rate of return. You're in a 28 percent tax
24 bracket and let's assume there's a .35 percent advisor
25 fee. That's a fee that you would be happy to pay, if

1 you can get eight percent every single year, right?

2 So, in this example, we're assuming --
3 column number one, we're assuming a thousand dollar
4 month contribution. That's \$12,000.00 a year. Column
5 number five is what you are netting after taxes and
6 after the advisor fee.

7 This is what you're netting on an eight
8 percent rate of return. That's -- you can see, that's
9 column one through five. Now, let's table that for a
10 second.

11 Now, let's focus on how indexed universal
12 life will do, columns six through ten. Same money,
13 same contribution.

14 Now, IUL, as you see -- I'm going to assume,
15 as you see in the upper -- the center of the page.
16 I'm going to assume a 7.5 percent rate of return on
17 IUL. Is that guaranteed? No, it's not guaranteed.
18 But, that's historically about what it does, and I've
19 kind of proved that already during the -- during this
20 presentation.

21 And again, the book outlines any -- that's
22 a -- between 6.5 and 8 is historically what they do
23 most of the time. And just like I can't guarantee you
24 an eight percent rate of return on this example, you
25 get the idea.

1 I'm trying to pay -- I'm trying to purposely
2 show the -- the stock market outperforming IUL. Look
3 at the performance. Look how it grows. You put in a
4 thousand dollars a month. That's \$12,000.00 a year.
5 Look at column eight. I want to get this out in the
6 open.

7 Here is the pitfall of this product.
8 Remember I said earlier, you put in a dollar into the
9 policy. The dollar becomes 85 cents. Well, here's
10 what it does.

11 Your -- your \$12,000.00 contribution becomes
12 \$10,200.00 day one. Okay? There's the negative.
13 There's the only negative.

14 So, you need the same four, five, six, seven
15 year time horizon with this to get all your money
16 back, as you did at any -- and again, this is not an
17 overnight thing. You need to take the same long-term
18 perspective with IUL as you do an IRA or a 401K, okay,
19 when you start putting money into that.

20 However, this product shines when you
21 withdraw the money for retirement or distribution.
22 Let's fast-forward 15 years. As you can see, in year
23 number 16, this individual's 66 at this point.

24 Look in column -- see where it says
25 \$30,750.00 all the way to the right? We're staying --

1 we're -- stay on the IUL side of things. This policy
2 can generate \$30,000.00, \$30,755.00 every year from
3 basically the end of the 65th year to the end of the
4 85th year. Okay? That's \$615,000.00 that this policy
5 can generate.

6 Well, is that good or bad? Let's compare
7 pulling out \$30,000.00 out of a taxable vehicle that's
8 earning eight percent every single year, which we both
9 know you will -- that will not happen.

10 You run out of money, as you see, in the
11 27th year. So, your -- your mutual fund that's
12 earning eight percent that you've got to pay taxes on,
13 is going to run out of money about eight or nine years
14 before IUL is going to run out of money.

15 So, the totals -- your mutual funds with
16 taxes are going to net you 306 -- \$368,000.00, as you
17 see in the lower left, versus IUL that's going to spit
18 out \$615,000.00. That's a 68 percent increase. I
19 hope you agree that's a -- that's a big increase.
20 That's a big percentage increase. Again, I say to
21 you, cut in half.

22 What if you only got 34 percent more money?
23 So again, IUL is bad in the first couple years,
24 because they have to take some money out of the
25 account to pay for the death benefit, right? But,

1 it's -- as an income stream, it's fantastic. All
2 right?

3 Now, let's tie it all together. I want to
4 show you what we refer to as -- remember Couple A,
5 Couple B? This is the distribution plan. Remember
6 this slide? This is -- I said to you, "If I can
7 get -- show you how to get safer, more liquid, less
8 taxes, higher returns, no cash flow change," everybody
9 listening to my voice and watching me would want this.

10 So, I just educated you on how the product
11 works. I proved to you how it works. And now, it's
12 time for you to see how we make all this possible.
13 Let's turn to, how do you become -- how do you go from
14 being Couple A to Couple B?

15 Well, let's start with in this scenario. In
16 this scenario, let's pretend you're 60 years old. All
17 right? And again, this works whether you're 65 or
18 whether you're 55. But, for this one discussion,
19 you're 60 years old. And this is what Couple A would
20 have done prior to meeting me.

21 They'd have a million bucks. Let's say you
22 get a five percent rate of return on your money. And
23 I challenge you to get any calculator to prove the
24 math on all these numbers you see here.

25 On the far left-hand column, we're going to

1 measure how -- what kind of money you can net from 65
2 all the way to 95. If you have to pause the video
3 right now to digest this, I want to make sure you do
4 it.

5 This is the guy, or couple I should say,
6 that's going to live off the interest. But now, we're
7 going to throw taxes into the mix.

8 A million dollars earning -- earning a five
9 percent rate of return is going to generate \$50,000.00
10 a year, as you can see, under the columns saying
11 "gross withdraw". We're going to -- we're just going
12 to keep the math simple, try and keep it simple, in
13 that 28 percent tax bracket.

14 And by the way, I'm not -- I'm not saying
15 this is the only money the individual has. But, I'm
16 just trying -- again, you get the idea. We're going
17 to throw taxes into the mix, because they have to be
18 considered on a financial plan.

19 This individual is going to net \$36,000.00.
20 All right? Stay with me. 65 to 95. This
21 individual's going to net \$36,000.00 each year, and
22 they're living off the interest because they're scared
23 to spend the money. How much do you spend?

24 If you start attacking the principle, you're
25 going to be fearful that you're going to run out of

1 principle, and the -- the principle is going to
2 generate less income. All right? That's a total of
3 \$1.1 million you see in the lower right-hand corner.
4 Okay. That's Couple A.

5 Now, Couple B reads my book. They watch
6 this presentation and they're going to implement --
7 they're going to buy an indexed universal life policy.
8 So, for this discussion, let's just say they're going
9 to take \$50,000.00 out of their million dollar
10 portfolio. And they're going to put \$50,000.00 for
11 five consecutive years into one of these policies.

12 Why don't they just -- why don't they just
13 dump \$250,000.00 in, in one lump sum? Because if they
14 do that, I compare it to doing a cannonball in the
15 deep end of a pool. That would create big waves. We
16 want little waves.

17 We want a little death benefit. We want as
18 small a death benefit as we can, and we get that by
19 taking the dollar amount that we work together with
20 you to put into the policy. And we put it in over
21 five years instead of one year.

22 By putting it over five years, the death
23 benefit stays as low as we can make it, which again,
24 allows your fees to be as small as possible. And the
25 more -- the less fees you have, the more money you

1 net, which is what we want.

2 So, put the money in over a five-year
3 period. You can see the death benefit starts at
4 \$669,000.00, as you see in the far-right column. What
5 I want to do is, I want to fast-forward to when this
6 individual completes his 85th birthday.

7 See where it says "loan amount" in the
8 middle? This policy will generate, income tax free,
9 assuming, by the way, 7.5 percent return -- which
10 is -- which again is historically what it'll do --
11 \$63,000.00 a year tax free during that ten-year
12 period. All right?

13 Now, we'll come back to this slide in a
14 second. But, I want you to see what's ahead of you.
15 This individual knows what's ahead of him.

16 Now, let's go back to age 65. Now again,
17 we've got this client who had a million dollars.
18 \$750,000.00 is still in the same investment vehicles
19 that he had before, earning a five percent rate of
20 return. And the other 250 is shifted over to indexed
21 universal life. We haven't changed anybody's cash
22 flow, okay? We just -- we just put it into two
23 different vehicles; same -- same million dollars.

24 Now, what I want this individual to do with
25 the 600 -- with the \$750,000.00, I want this person to

1 spend down his money. Let me ask you a question.

2 If you knew that your spouse -- I'm talking
3 to the guys here. If you knew that your spouse would
4 be taken care of because of a big death benefit when
5 you pass away -- statistically, you're going to pass
6 away before your wife.

7 If you die before your wife, and she would
8 receive a big fat insurance death benefit payout, what
9 is that a permission slip to do with the rest of your
10 money? Spend it. Think about that for a second.

11 We're going to get a -- we're going to get a
12 universal life policy with a piece of your money.
13 It's going to protect your wife in the event you pass
14 away before her, which statistically you will.

15 But your benefit, guys, your benefit is,
16 because we know your spouse is taken care of, what do
17 you do with the rest of the money? You spend it. You
18 spend it down and you enjoy it.

19 So, what I want this individual to do,
20 Couple B, I want them to spend their money from age 65
21 to age 85. I want them to spend principle and
22 interest, so that at age -- at the end of the 85th
23 birthday, there's zero money in the mutual funds. Why
24 would we do that?

25 Because if you're still alive, you're going

1 to take the money out of the indexed universal life
2 policy, which I showed you a minute ago. Now, follow
3 the numbers with me here. This is very key.

4 So, if we spend principle and interest, with
5 less money, \$750,000.00 in this example, we are going
6 to be able to spend down \$58,000.00 a year. Your net
7 income is going to be \$47,000.00. Okay? And look at
8 the net income. Look what's happening.

9 Your net income is actually going up each
10 year. How is that? You see, you are taxed on the
11 gains of your principle. And what are you doing in
12 this example with your principle? You're spending it
13 down.

14 So, by spending the principle and interest,
15 right, by spending down your principle, your taxes are
16 reduced. Why? You are taxed on the gains of your
17 principle. And if you spend down your principle,
18 you're eroding it obviously, and your principle earns
19 less.

20 The more -- the less you earn, the less
21 you're taxed. The less you're taxed, the more you
22 obviously keep for yourself. So, as the cost of milk
23 and bread are going up, your income is going up.
24 You're netting more money. It's like an inflation
25 hedge.

1 So, you look at the net income column.
2 You're earning \$47,000.00, to \$48,000.00, to 49. You
3 are netting more -- your reward for spending an
4 enjoying your money is less taxes. Okay?

5 Now, let's pretend you get to age 86 and
6 you're still here. Let's hope you are. This mutual
7 fund bucket of money that we're referring to here is
8 now gone.

9 But, what do you do? You pick up the phone
10 and you call the insurance company. And you could
11 pull out \$63,000.00 a year, tax free, from the
12 insurance company. Again, I showed you that earlier.

13 You could pull out \$63,000.00 each and every
14 year tax free. And again, you're netting -- that's
15 what you're netting. So, let's do a comparison.

16 Couple A, living off the interest -- that's
17 what you've been told by the traditional advisors --
18 is going to net 1.1 million as you see on the
19 left-hand side. Couple B, by implementing putting a
20 piece of their retirement portfolio into one of these
21 indexed universal life policies, is going to spend and
22 enjoy \$1.7 million.

23 They're going to pay about two-thirds less
24 taxes. Okay? That is a 55 percent increase in
25 income, and they're going to pay again, one-third the

1 taxes as Couple A is going to do. So, who would you
2 rather be, Couple A or Couple B?

3 Oh, by the way, let's pretend you passed
4 away in this example at age 87. There's still a death
5 benefit in this example of \$732,000.00. I assure you,
6 your children will get a nice chunk of that, but only
7 what you and your spouse are done with. All right?

8 It's time to -- where you've got to
9 reposition your money to -- to again, allow you to
10 spend and enjoy your money. Your spouse will be taken
11 care of if -- should you pass away early.

12 If you get to an old age, you're -- your --
13 the money within the policy is compounding tax free,
14 without the risk of loss, with getting all these
15 tremendous benefits we already covered, and I already
16 proved to you it worked -- and that -- that work. And
17 again, when you pass away, there's still going to be
18 plenty of death benefit to pass on to your kids.

19 So, this is the last slide, like I promised
20 you. Based on the exercise I just walked you through,
21 is this client -- is the client safer? Absolutely,
22 they're safer. And why are they safer? They're safer
23 because they're more liquid.

24 You know the cash value in your policies is
25 absolutely -- it's completely liquid. So, the cash

1 surrender value, which you saw -- all the -- all the
2 policy cash values, the cash surrender values we
3 saw -- we showed you, they are all accessible to you.
4 So, you are more liquid.

5 Because you're more liquid, that means
6 you're more safe. Think of a crisis in your life that
7 you're not better off with having access to more
8 money. So, because you're more liquid, you're more
9 safe.

10 And you're paying less taxes. I just proved
11 it to you. Are you -- you're getting higher returns,
12 less volatile returns, with no cash flow change. I
13 just showed you how to do all of this over the past --
14 during this presentation, again, without changing your
15 cash flow.

16 When you work with us, or when you work with
17 one of our advisors, we're going to get together.
18 We're going to understand where all your money is, and
19 we're going to put a plan together to reposition some
20 of your money, so that you can put some of your money
21 into one of these policies, into an indexed universal
22 life policy, so -- again, so you can get all these
23 benefits that we just covered. Okay?

24 Hopefully, didn't throw too much at you. I
25 highly recommend you get the book. Read the book.

1 The book gives much more details and much more
2 examples, much more -- many more charts, and using
3 again, statement after statement, annual statements
4 from my clients, to prove this works.

5 You want to significantly improve your
6 finances? You want to significantly improve your
7 retirement planning? You need to make this indexed
8 universal life policy 25 to 50 percent of your
9 portfolio.

10 And again, when you come in, we're going to
11 help. We're going to help run these numbers for you
12 and see how it applies to your situation. All right?
13 We look forward to seeing you. Thank you.

14 (End of video file.)

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A Better Financial Plan Unbranded Video

Ann Dooley

Transcriber

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 The reader should not assume that the information is accurate and complete.

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
 Washington, D.C. 20549
FORM D

OMB APPROVAL	
OMB Number:	3235-0076
Estimated average burden hours per response:	4.00

Notice of Exempt Offering of Securities

1. Issuer's Identity

CIK (Filer ID Number) 0001785909	Previous Names <input checked="" type="checkbox"/> None	Entity Type <input type="checkbox"/> Corporation <input type="checkbox"/> Limited Partnership <input checked="" type="checkbox"/> Limited Liability Company <input type="checkbox"/> General Partnership <input type="checkbox"/> Business Trust <input type="checkbox"/> Other (Specify)
Name of Issuer RE INCOME FUND 2, LLC		
Jurisdiction of Incorporation/Organization DELAWARE		
Year of Incorporation/Organization <input type="checkbox"/> Over Five Years Ago <input checked="" type="checkbox"/> Within Last Five Years (Specify Year) 2019 <input type="checkbox"/> Yet to Be Formed		

2. Principal Place of Business and Contact Information

Name of Issuer RE INCOME FUND 2, LLC			
Street Address 1 13990 E. SR 44	Street Address 2 SUITE 202		
City WILDWOOD	State/Province/Country FLORIDA	ZIP/PostalCode 34785	Phone Number of Issuer 352-448-8220

3. Related Persons

Last Name Gissas	First Name John	Middle Name
Street Address 1 c/o RE Income Fund 2, LLC	Street Address 2 13990 E. SR 44, SUITE 202	
City WILDWOOD	State/Province/Country FLORIDA	ZIP/PostalCode 34785
Relationship: <input checked="" type="checkbox"/> Executive Officer <input type="checkbox"/> Director <input type="checkbox"/> Promoter		

Clarification of Response (if Necessary):

[President](#)

4. Industry Group

<input type="checkbox"/> Agriculture	<input type="checkbox"/> Health Care	<input type="checkbox"/> Retailing
<input type="checkbox"/> Banking & Financial Services	<input type="checkbox"/> Biotechnology	<input type="checkbox"/> Restaurants
<input type="checkbox"/> Commercial Banking	<input type="checkbox"/> Health Insurance	<input type="checkbox"/> Technology
<input type="checkbox"/> Insurance	<input type="checkbox"/> Hospitals & Physicians	<input type="checkbox"/> Computers
<input type="checkbox"/> Investing	<input type="checkbox"/> Pharmaceuticals	<input type="checkbox"/> Telecommunications
<input type="checkbox"/> Investment Banking	<input type="checkbox"/> Other Health Care	<input type="checkbox"/> Other Technology
<input checked="" type="checkbox"/> Pooled Investment Fund	<input type="checkbox"/> Manufacturing	<input type="checkbox"/> Travel
<input type="checkbox"/> Hedge Fund	<input type="checkbox"/> Real Estate	<input type="checkbox"/> Airlines & Airports
<input type="checkbox"/> Private Equity Fund	<input type="checkbox"/> Commercial	<input type="checkbox"/> Lodging & Conventions
<input type="checkbox"/> Venture Capital Fund	<input type="checkbox"/> Construction	<input type="checkbox"/> Tourism & Travel Services
<input checked="" type="checkbox"/> Other Investment Fund	<input type="checkbox"/> REITS & Finance	<input type="checkbox"/> Other Travel
Is the issuer registered as an investment company under the Investment Company Act of 1940?	<input type="checkbox"/> Residential	<input type="checkbox"/> Other
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Other Real Estate	
<input type="checkbox"/> Other Banking & Financial Services		
<input type="checkbox"/> Business Services		
Energy		
<input type="checkbox"/> Coal Mining		
<input type="checkbox"/> Electric Utilities		
<input type="checkbox"/> Energy Conservation		
<input type="checkbox"/> Environmental Services		
<input type="checkbox"/> Oil & Gas		
<input type="checkbox"/> Other Energy		

5. Issuer Size

Revenue Range	OR	Aggregate Net Asset Value Range
<input type="checkbox"/> No Revenues		<input type="checkbox"/> No Aggregate Net Asset Value
<input type="checkbox"/> \$1 - \$1,000,000		<input type="checkbox"/> \$1 - \$5,000,000
<input type="checkbox"/> \$1,000,001 - \$5,000,000		<input type="checkbox"/> \$5,000,001 - \$25,000,000
<input type="checkbox"/> \$5,000,001 - \$25,000,000		<input type="checkbox"/> \$25,000,001 - \$50,000,000
<input type="checkbox"/> \$25,000,001 - \$100,000,000		<input type="checkbox"/> \$50,000,001 - \$100,000,000
<input type="checkbox"/> Over \$100,000,000		<input type="checkbox"/> Over \$100,000,000
<input type="checkbox"/> Decline to Disclose		<input checked="" type="checkbox"/> Decline to Disclose
<input type="checkbox"/> Not Applicable		<input type="checkbox"/> Not Applicable

6. Federal Exemption(s) and Exclusion(s) Claimed (select all that apply)

<input type="checkbox"/> Rule 504(b)(1) (not (i), (ii) or (iii))	<input type="checkbox"/> Investment Company Act Section 3(c)
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- | | | |
|---|--|---|
| <input type="checkbox"/> Rule 504 (b)(1)(i) | <input type="checkbox"/> Section 3(c)(1) | <input type="checkbox"/> Section 3(c)(9) |
| <input type="checkbox"/> Rule 504 (b)(1)(ii) | <input type="checkbox"/> Section 3(c)(2) | <input type="checkbox"/> Section 3(c)(10) |
| <input type="checkbox"/> Rule 504 (b)(1)(iii) | <input type="checkbox"/> Section 3(c)(3) | <input type="checkbox"/> Section 3(c)(11) |
| <input checked="" type="checkbox"/> Rule 506(b) | <input type="checkbox"/> Section 3(c)(4) | <input type="checkbox"/> Section 3(c)(12) |
| <input type="checkbox"/> Rule 506(c) | <input type="checkbox"/> Section 3(c)(5) | <input type="checkbox"/> Section 3(c)(13) |
| <input type="checkbox"/> Securities Act Section 4(a)(5) | <input type="checkbox"/> Section 3(c)(6) | <input type="checkbox"/> Section 3(c)(14) |
| | <input type="checkbox"/> Section 3(c)(7) | |

7. Type of Filing

- New Notice Date of First Sale 2019-08-01 First Sale Yet to Occur
- Amendment

8. Duration of Offering

Does the Issuer intend this offering to last more than one year? Yes No

9. Type(s) of Securities Offered (select all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Equity | <input type="checkbox"/> Pooled Investment Fund Interests |
| <input checked="" type="checkbox"/> Debt | <input type="checkbox"/> Tenant-in-Common Securities |
| <input type="checkbox"/> Option, Warrant or Other Right to Acquire Another Security | <input type="checkbox"/> Mineral Property Securities |
| <input type="checkbox"/> Security to be Acquired Upon Exercise of Option, Warrant or Other Right to Acquire Security | <input type="checkbox"/> Other (describe) |

10. Business Combination Transaction

Is this offering being made in connection with a business combination transaction, such as a merger, acquisition or exchange offer? Yes No

Clarification of Response (if Necessary):

11. Minimum Investment

Minimum investment accepted from any outside investor \$25,000 USD

12. Sales Compensation

- | | | |
|---|---|-----------------|
| Recipient | Recipient CRD Number <input checked="" type="checkbox"/> None | |
| (Associated) Broker or Dealer <input checked="" type="checkbox"/> None | (Associated) Broker or Dealer CRD Number <input checked="" type="checkbox"/> None | |
| Street Address 1 | Street Address 2 | |
| City | State/Province/Country | ZIP/Postal Code |
| State(s) of Solicitation (select all that apply)
Check "All States" or check individual States | <input type="checkbox"/> All States <input type="checkbox"/> Foreign/non-US | |

13. Offering and Sales Amounts

Total Offering Amount \$50,000,000 USD or Indefinite

Total Amount Sold \$150,000 USD

Total Remaining to be Sold \$49,850,000 USD or Indefinite

Clarification of Response (if Necessary):

14. Investors

Select if securities in the offering have been or may be sold to persons who do not qualify as accredited investors, and enter the number of such non-accredited investors who already have invested in the offering.

Regardless of whether securities in the offering have been or may be sold to persons who do not qualify as accredited investors, enter the total number of investors who already have invested in the offering:

15. Sales Commissions & Finder's Fees Expenses

Provide separately the amounts of sales commissions and finders fees expenses, if any. If the amount of an expenditure is not known, provide an estimate and check the box next to the amount.

Sales Commissions \$0 USD EstimateFinders' Fees \$0 USD Estimate

Clarification of Response (if Necessary):

16. Use of Proceeds

Provide the amount of the gross proceeds of the offering that has been or is proposed to be used for payments to any of the persons required to be named as executive officers, directors or promoters in response to Item 3 above. If the amount is unknown, provide an estimate and check the box next to the amount.

\$0 USD Estimate

Clarification of Response (if Necessary):

Signature and Submission

Please verify the information you have entered and review the Terms of Submission below before signing and clicking SUBMIT below to file this notice.

Terms of Submission

In submitting this notice, each issuer named above is:

- Notifying the SEC and/or each State in which this notice is filed of the offering of securities described and undertaking to furnish them, upon written request, in the accordance with applicable law, the information furnished to offerees.*
- Irrevocably appointing each of the Secretary of the SEC and, the Securities Administrator or other legally designated officer of the State in which the issuer maintains its principal place of business and any State in which this notice is filed, as its agents for service of process, and agreeing that these persons may accept service on its behalf, of any notice, process or pleading, and further agreeing that such service may be made by registered or certified mail, in any Federal or state action, administrative proceeding, or arbitration brought against the issuer in any place subject to the jurisdiction of the United States, if the action, proceeding or arbitration (a) arises out of any activity in connection with the offering of securities that is the subject of this notice, and (b) is founded, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these statutes, or (ii) the laws of the State in which the issuer maintains its principal place of business or any State in which this notice is filed.

SEC FORM D

- Certifying that, if the issuer is claiming a Regulation D exemption for the offering, the issuer is not disqualified from relying on Rule 504 or Rule 506 for one of the reasons stated in Rule 504(b)(3) or Rule 506(d).

Each Issuer identified above has read this notice, knows the contents to be true, and has duly caused this notice to be signed on its behalf by the undersigned duly authorized person.

For signature, type in the signer's name or other letters or characters adopted or authorized as the signer's signature.

Issuer	Signature	Name of Signer	Title	Date
RE INCOME FUND 2, LLC	John Gissas	John Gissas	President	2019-08-21

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.

* This undertaking does not affect any limits Section 102(a) of the National Securities Markets Improvement Act of 1996 ("NSMIA") [Pub. L. No. 104-290, 110 Stat. 3416 (Oct. 11, 1996)] imposes on the ability of States to require information. As a result, if the securities that are the subject of this Form D are "covered securities" for purposes of NSMIA, whether in all instances or due to the nature of the offering that is the subject of this Form D, States cannot routinely require offering materials under this undertaking or otherwise and can require offering materials only to the extent NSMIA permits them to do so under NSMIA's preservation of their anti-fraud authority.