

Argent Retirement Plan Advisors, LLC

**201 St. Charles Ave., Suite 2420
New Orleans, Louisiana 70170**

**Telephone: 318-251-5800
Facsimile: 318-251-4651**

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Argent Retirement Plan Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 318-251-5834. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Argent Retirement Plan Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Argent Retirement Plan Advisors, LLC is a registered investment adviser. Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last Annual Amendment filing, made on March 24, 2021, there have been no material changes made to our Part 2A Brochure.

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Item 4 **Advisory Business**

Description of Services and Fees

Argent Retirement Plan Advisors, LLC (“Argent Retirement”), DBA Heritage Retirement Plan Advisors, is a registered investment adviser, organized as a limited liability company under the laws of the state of Oklahoma. Our firm has been providing investment advisory services since 2012. Argent Financial Group, Inc. is our principal owner. R. Brad Knowles is our Managing Director and Mark Milton is our President.

Currently, we offer the following investment advisory services, which are tailored to each client relationship:

- Pension Consulting Services
- Investment Management Services

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your plan needs. As used in this brochure, the words "we", "our" and "us" refer to Argent Retirement and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

Scope of Services Overview: Argent Retirement provides investment advisory/pension consulting services to retirement plans, primarily participant directed retirement plans. Argent Retirement **does not** provide services to any other type entities, **nor** is it engaged by any individuals to provide investment advisory services. Except for a limited number of defined benefit plan non-discretionary engagements (discussed below), Argent Retirement does not execute any securities transactions for its clients. Argent Retirement is custodian neutral (the retirement account custodian is usually directed by the Plan sponsor). Argent Retirement’s **only** compensation is derived from the advisory fees paid to it by its clients. Argent Retirement does not receive any transaction-based or any other type compensation. Except for the limited number of **non-discretionary** defined benefit plans referenced above, Argent Retirement **does not** engage in any trading activity. Argent Retirement **does not** currently implement any securities transactions for participant directed retirement plan clients, nor does it currently devise and manage any asset allocation models that are included on a plan’s investment platform. All clients execute an **Investment Policy Statement** that governs the advisory engagement.

Argent Retirement’s primary business is engagement by participant directed retirement plan sponsors to assist Plan sponsors with the investment menu from which plan participants shall choose in managing their individual plan retirement accounts. The engagement is generally obtained by Argent Retirement as result of an RFP process. All RFPs are reviewed and approved by Argent Retirement’s Chief Compliance Officer prior to submission to the requesting Plan. For such engagements, Argent Retirement recommends a platform of unaffiliated investment vehicles to the Plan trustees for their consideration and approval (primarily, unaffiliated lowest appropriate share class open-end mutual funds, with the small remainder allocated to collective trusts when the internal expenses of the trusts are less than their mutual fund counterparts). In limited engagements, Argent Retirement has been granted the authority by the Plan trustees to select the investment vehicles. Plan participants then choose from the investments on the approved platform to manage their individual retirement accounts (the participants make their own transactions). Argent Retirement may also, when specifically engaged to do so, provide general education to participants to assist them in making investment decisions for their individual retirement accounts. Plan clients continue to receive a 408(b)(2) Notice upon engagement, and if/when there is a change to such Notice. Argent Retirement continues to maintain an ERISA bond.

Pension Consulting Services

Our primary business is pension consulting services to participant directed ERISA plans (**see below**). Before engaging Argent Retirement to provide services, clients are required to enter into an agreement with us setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the fees that a client will incur (**see** fee schedule at Item 5 below). Argent Retirement provides pension consulting and investment advisory services specific to the needs of each client. Before providing

pension consulting and/or investment advisory services, we will ascertain the client's (i.e., the plan) investment objective(s), and confirm same in an Investment Policy Statement.

We offer pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring, and/or ongoing consulting. These pension consulting services will generally be advisory in nature. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

We may also assist with participant enrollment meetings and provide investment-related educational seminars to plan participants on such topics as:

- Diversification
- Asset allocation
- Risk tolerance
- Time horizon

Our educational seminars may include other investment-related topics specific to the particular plan.

We may also provide additional types of pension consulting services to plans on an individually negotiated basis. All services, whether discussed above or customized for the plan based upon requirements from the plan fiduciaries (which may include additional plan-level or participant-level services) shall be detailed in a written agreement and be consistent with the parameters set forth in the plan documents.

Investment Management Services

We may also provide non-discretionary investment advisory services to defined benefit plans specific to the needs of each plan. Before providing investment advisory services, an investment adviser representative will ascertain each plan's investment objective(s) and restrictions, if any, as confirmed in the Investment Policy Statement. Thereafter, we will recommend that the plan client allocate investment assets consistent with their designated investment objectives as stated in the Investment Policy Statement. Once allocated, we provide ongoing monitoring and review of account performance and asset allocation to help maintain the client's investment portfolio consistent with the plan's investment objectives as stated in the Investment Policy Statement.

Types of Investments

Argent Retirement generally recommends a platform of unaffiliated investment vehicles to the Plan trustees for their consideration and approval (primarily, lowest cost appropriate share class open-end mutual funds, with the small remainder allocated to collective trusts when the internal expenses of the trusts are less than their mutual fund counterparts). We can and do offer advice on stocks, bonds, mutual funds, and ETFs. Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Use of Mutual Funds and Exchange Traded Funds

Most, if not all, of the mutual fund we use are available to the public. However, we generally use mutual fund share classes that are not available to the public. Therefore, a prospective client can obtain many of the funds that may be utilized by Argent Retirement independent of engaging Argent Retirement as an investment advisor. However, if a prospective client determines to do so, they will not receive Argent Retirement's initial and ongoing investment advisory services and may not have access to the same share classes Argent Retirement would use. In addition to Argent Retirement's investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Portfolio Activity

Argent Retirement has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Argent Retirement will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Argent Retirement determines that recommending changes to a client's portfolio are neither necessary, nor prudent. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

Limitations of Service - No Financial Planning - No Non-Investment Implementation Services

Argent Retirement does not provide financial planning or related consulting services regarding non-investment related matters, such as tax and estate planning, insurance, etc. We do not serve as an attorney, accountant, record keeper, pension administrator, or insurance agent, and no portion of our services should be construed as same.

Accordingly, we do not prepare estate planning documents, tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc. The client is under no obligation to engage the services of any such recommended professional.

The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Argent Retirement and/or its representatives. If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and not Argent Retirement, shall be responsible for the quality and competency of the services provided.

Client Obligations

In performing our services, Argent Retirement shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify Argent Retirement if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising our previous recommendations and/or services.

Investment Risk

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments recommended or undertaken by Argent Retirement) will be profitable or equal any specific performance level(s).

Cash and Cash Equivalent Positions. Argent Retirement could determine to hold a significant portion of a client's assets in cash or cash equivalents (i.e., money market accounts, etc.). Investments in these cash-type assets may cause a client to miss market advances. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the Registrant may maintain cash positions for defensive purposes. The Registrant continues to treat cash as an asset class. Therefore, unless the Registrant expressly agrees otherwise in writing, account assets consisting of cash and cash equivalents are included in the value of an account's assets for purposes of calculation of the Program Fee or the client's advisory fee. Depending upon current yields, at any point in time, our advisory fee could exceed the interest paid by the client's money market fund.

Assets Under Management

As of December 31, 2021, we manage approximately \$656,159,203 in assets on a non-discretionary basis. Additionally, we provide investment advice to over \$1 Billion in pension plan assets.

Item 5 Fees and Compensation

Pension Consulting Services

Our fee schedule for pension consulting services is as follows:

| Assets | Annual Fee |
|------------------------------|-------------------|
| \$1.5 million to \$5 million | 0.65% |
| \$5 million to \$10 million | 0.50% |
| \$10 million to \$15 million | 0.40% |
| \$15 million to \$25 million | 0.30% |
| \$25 million to \$35 million | 0.20% |
| More than \$35 million | 0.15% |

The above fee schedule is not tiered, instead fees shall be calculated using the lowest percentage rate reached, based upon the aggregate value of the plan.

Accounts with less than \$1.5 million in assets will be charged a fixed fee of \$3,000 per quarter. As the result thereof, plans with less than \$1.5 million of assets will pay a higher percentage advisory fee than that stated in the above fee schedule.

Our advisory fees for customized services will be negotiated with the plan sponsor or named fiduciary on a case-by-case basis.

The above fee can be modified at our discretion (i.e. charge a different percentage fee, a flat fee, modify/waive the quarterly minimum fee, billing interval, etc.) based upon various objective and subjective factors including but not limited to: the amount of assets within the plan; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; the professional(s) rendering the service(s); prior relationships with us and/or our representatives, competition, and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees, the services we provide to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above.

Fees will be billed and paid monthly or quarterly in arrears. If our services are retained in the middle of a billing period, the fee for such month or quarter will be calculated on a pro rata basis, based upon the number of days remaining in the month or quarter.

We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to plan participants at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy.

Unless otherwise mutually agreed to by the parties, either party to the pension consulting agreement may terminate the agreement upon 90-days• written notice to the other party. The pension consulting fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to the client.

Investment Management Services

Our annual non-discretionary investment advisory fee is based upon a percentage (%) of the market value of the client's assets placed under our management. Our fee shall generally be between negotiable and 2.00% of the client's assets under management.

Our investment advisory fee is negotiable at our discretion, depending upon objective and subjective factors, including but not limited to: the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related

accounts; anticipated future additional assets; the professional(s) rendering the service(s); prior relationships with our firm and our representatives, competition, and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees, the services to be provided by the firm to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above.

Grandfathering of Account Terms

Pre-existing advisory clients are subject to our minimum account requirements, advisory fees and billing terms in effect at the time the client entered into the advisory relationship. Therefore, our firm's account terms will differ among clients.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the Brokerage Practices section of this brochure.

Item 6 Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the Advisory Business section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We generally offer investment advisory services to pension and profit sharing plans.

Argent Retirement, in its sole discretion, may reduce or waive its minimum quarterly fee. A plan client that maintain less than \$1,500,000 of assets, and is subject to the \$3,000 per quarter minimum fee, could pay a higher percentage quarterly fee than that referenced in the above fee schedule.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

- **Risk:** The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As indicated above, Argent Retirement recommends a platform of unaffiliated investment vehicles to the Plan trustees for their consideration and approval (primarily, unaffiliated lowest appropriate share class open-end mutual funds, with the small remainder allocated to collective trusts when the internal expenses of the trusts are less than their mutual fund counterparts).

As disclosed under the Advisory Business section in this brochure, we can offer advice on collective investment trusts, mutual funds and ETFs. We may recommend other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual Funds, Exchange Traded Funds (ETFs) and Collective Investment Trusts (CITs): Mutual funds, ETFs and CITs are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund or trust will have a manager that trades investments in accordance with its investment objective. While mutual funds, ETFs and CITs generally provide diversification, risks can be significantly increased if the fund or trust is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities.

Exchange traded funds differ from mutual funds and CITs since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

A CIT, is a group of pooled accounts held by a bank or trust company. CITs are generally available through employer-sponsored retirement plans, pension plans, and insurance companies. Although CITs are pooled funds just as mutual funds are, CITs are unregistered investment vehicles, not unlike hedge funds. The primary objective of a collective investment trust is, through the use of economies of scale, to lower costs with a combination of profit-sharing funds and pensions.

Please Note: In addition to Argent Retirement's investment advisory fee described above, and transaction and/or custodial fees charged to the client for purchase of securities for the account (i.e. mutual funds, ETFs, etc.), clients will also incur, relative to all mutual fund, ETFs and CITs, charges imposed at the fund or trust level (e.g. management fees and other fund expenses).

Item 9 Disciplinary Information

Argent Retirement has no reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Argent Financial Group, our principal owner, is also the sole owner of Argent Fiduciary Consulting Services, LLC (provides consulting and compliance services to trust companies and registered investment advisers), Whyden Capital Management, LLC (affiliated Georgia state registered investment adviser firm), Argent Trust Company of Oklahoma (an Oklahoma Trust Company), Argent Insurance Services, LLC (insurance), Argent Mineral Management, LLC (oil and gas, lease management, timber property management, etc.), Argent Advisors Leasing Services, LLC (an employment leasing company), Argent Trust Company (custodian and trust services), and Ameritrust Investment Advisors, Inc. (affiliated Oklahoma state registered investment adviser firm).

In certain circumstances, our Associated Persons may refer clients to entities owned by Argent Financial Group, including those referenced in the immediately preceding paragraph. Those entities may provide services to the client, which are not investment-related. There are no referral fee agreements between Argent Retirement and any affiliated entities. Regardless, any such referral raises the potential for conflict of interest.

Clients are under no obligation to engage the services of such affiliated entities.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To

eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Please refer to the Brokerage Practices section in this brochure for information on our block trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

If and when engaged to provide non-discretionary investment advisory services to defined benefit plans, if requested to recommend a broker-dealer/custodian, Argent Retirement will generally recommend the brokerage and custodial services of TD Ameritrade, among others. We believe that we recommend brokerage firms that provide quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. The client could pay higher commissions and/or trading costs at TD Ameritrade than those that may be available elsewhere. The client is free to engage the brokerage/custody provider of its choosing. **See** Item 14 below regarding research and other benefits we may receive from our relationship with TD Ameritrade.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Item 13 Review of Accounts

Your advisor(s), will monitor accounts on a periodic basis and will conduct account reviews at least quarterly to confirm the advisory services provided to you and that the portfolio mix is consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We will not provide you with additional or regular written reports in conjunction with account reviews.

Item 14 Client Referrals and Other Compensation

Argent Retirement could, but does not currently, receive, from an account custodian without cost (and/or at a discount), support services and/or products, certain of which assist may Argent Retirement to better monitor and service client accounts maintained at such institutions, while others may assist Argent Retirement manage and/or further develop its business enterprise. If Argent Retirement does receive any

such support in the future, Argent Retirement clients will not pay more for investment transactions effected and/or assets maintained at such custodian as result of the arrangement. There shall be no corresponding commitment made by Argent Retirement to a custodian or any other entity to maintain a percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. Argent Retirement's Chief Compliance Officer, Carrie A. Brown, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding perceived conflict of interest such arrangements may create.

Argent Retirement does not compensate individuals or entities for prospective client introductions.

Item 15 Custody

As paying agent for our firm, your independent custodian may directly debit your account(s) for the payment of our advisory fees. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. **Please Note:** The account custodian does not verify the accuracy of Argent Retirement's advisory fee calculation.

If you have a question regarding your account statement, or if you did not receive a statement from your custodian, please contact us directly at the telephone number on the cover page of this brochure.

Item 16 Investment Discretion

Argent Retirement **does not** currently provide discretionary investment advisory or management services.

If, in the future, Argent retirement was to accept a discretionary engagement, the client shall be required to execute an Investment Advisory Agreement, naming us as the client's attorney and agent in fact, granting the firm full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account. In such prospective engagements, clients could impose restrictions, in writing, on our discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the use of margin, etc.).

Item 17 Voting Client Securities

Proxy Voting

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as

trustee or signatory for client accounts, and, we do not require the prepayment of more than \$1,200 in fees six or more months in advance nor have we filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.