



Introduction

Infinity Financial Services (“IFS”) is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment adviser, and investing.

What Investment Services And Advice Can You Provide Me?

IFS offers brokerage services to retail investors, which include buying and selling investments involving Corporate Securities, Corporate Debt Securities, Mutual Funds, US Government Securities, Municipal Securities, Variable Life Insurance or Annuities, Oil and Gas Interests, Puts and Calls, Option Writing including Uncovered Options, Tax Shelters or Limited Partnerships in Primary and Secondary Distributions, Private Placement of Securities, Non-exchange Member Arranging for Transactions in Listed Securities by Exchange Member, Unit Investment Trusts.

Recommendations are offered to retail investors.

Once the transaction is completed IFS does not provide monitoring services of the investments. IFS does not accept limited discretionary authority.

IFS does not have any minimum account size or investment amount requirements for retail investors to open or maintain an account or establish a relationship. However, the firm must adhere to the product or investment requirements associated with certain product sponsors being distributed; for example, a variable annuity, private placement, mutual fund minimum investment requirements.

For additional information, please request from the firm the Securities and Exchange Commission Regulation Best Interest: The Broker-Dealer Standard of Conduct.

Conversation Starter:

Ask your financial professional –

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

What fees will I pay?

The following is to reasonably disclose costs associated with transactions in equities, closed end Mutual Funds, Limited Partnerships, Exchange Traded Funds, Stock Options, and Government or Corporate bonds in the secondary market. They can have negotiable commission markups ranging from zero to 5%. Those commission expenses are negotiable between the broker at the time of the transaction and the retail investor. In certain circumstances there are relevant factors that could push the commission higher than 5%, such as: 1. Type of security involved 2. Availability of the security in the market 3. Price of the security 4. Amount of money involved in a transaction 5. Disclosure 6. Pattern of markups 7. Nature of the firm’s business. This could result in a conflict that a broker would look to trade in securities that would induce commissions higher than the 5% guideline FINRA has adopted.

Transactions in mutual funds could have load and no-load sales charges depending on the share class. Brokers could have a conflict by being incentivized to recommend the sale of mutual funds that pay a commission load. Unit Investment Trusts are similar to mutual funds except they have an expiration date which makes them redeemable as units to the investors. They are not actively traded, which is similar to Exchange Traded Funds. Variable life and annuities are similar to mutual funds, except they have a life insurance component. This makes the investment product more complex with higher transaction costs. The broker could have a conflict by soliciting sales in the higher commission investment products.

Transactions in securities of publicly registered unlisted Real Estate Investment Trust; or Direct Participation Program, such as Business Development Corporations or non-traded mutual fund under the Investment Advisors Act of 1940 could have a commission paid higher than other investments. Solicitations in those securities require careful attention due to expenses and lack of liquidity. This could result in a conflict that a broker would look to trade in securities that would induce commissions higher than the 5% guideline FINRA has adopted.

Transactions in Regulation D Private Placements could have a higher commission paid than other investments and have special qualifying criteria in order to be solicited for the purchase. This could result in being charged a higher than the 5% commission guideline adopted by FINRA.

Retail investors could experience higher solicitations as the firm’s brokers may have an incentive to encourage transactions in their accounts.

In addition to commissions, custodian fees, account maintenance fees, fees related to mutual funds and variable annuities, and other transactional fees and product-level fees can add to the cost of the investment transaction. For a schedule of fees charged by RBC CS and the broker dealer, you may visit Investor Connect directly at www.investor-connect.com where a list of fees is included.

While we will take reasonable care in developing and making recommendations to you, securities involve risk, and you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please consult any available offering documents for any security we recommend for a discussion of risks associated with the product.

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

For additional information, please request from the firm the Securities and Exchange Commission Regulation Best Interest: The Broker-Dealer Standard of Conduct.

Conversation Starter/Ask your financial professional –

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

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

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

A class “A” share mutual fund carries a sales load upfront of 4.5%, when the same mutual fund class “C” share carries a 1% deferred sales charge. There could be a conflict as to why a lower or higher commission share class was chosen.

A variable annuity exchange or replacement solicitation of an existing variable annuity contract for a new variable annuity could lose accumulated benefits and create a new surrender period. The conflict could be a new commission is generated for the financial professional.

Another conflict could come through third-Party Payments received from certain product sponsors in the form of a due diligence credit when a securities transaction is solicited and completed. The standard fee is ½% of the transaction to the broker dealer paid by the product sponsor.

A conflict of interest can develop between a financial professional and retail investor when there is not a clear understanding of the investment objectives. A reasonable understanding will vary based on the specific facts and circumstances, including the nature of the retail investor and the complexity of the anticipated solicitation. As a minimum, the financial professional needs to develop a reasonable understanding of a retail investors objectives, and inquiry into the retail investors financial situation, level of financial sophistication, investment experience, and financial goals (collectively the investment profile). When the information is inaccurate or not fully disclosed, conflicts arise. The Broker dealer, in fulfilling its obligation to make a recommendation in the best interest of its retail customer, must exercise reasonable diligence, care, and skill to understand the potential risks, rewards, and costs associated with the recommendation and have a reasonable basis to believe that the recommendation is in the best interest of the retail customer based on these factors. Financial Professionals should be reasonably familiar with the recommended security or investment strategy.

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Conversation Starter:

Ask your financial professional –

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

How Do Your Financial Professionals Make Money?

Financial Professionals make money through solicitation of investments that pay a commission. Some investment products have different compensation structures that provide ongoing distribution fees. This could be a conflict by resulting in higher fees longer term on the original investment.

Our Financial Professionals receive a portion of the compensation that you pay us and also receive a portion of the revenue that we receive from third parties. The type and amount of compensation varies by product type (mutual funds, annuities, etc.), by the size of the investment and by the services provided. Compensation for Financial Professionals usually includes upfront or deferred commissions, sales charges or placement fees, ongoing compensation for products such as mutual funds (12b-1 fees) and annuities and alternative investments (trail payments), and mark-ups or mark-downs (concessions) for bonds or other fixed income securities such as structured products.

We and our Financial Professionals receive payments from sponsors of investment products such as mutual funds, annuities, and alternative investments that we use to promote our services, provide information to customers and prospective customers, and pay expenses that we incur in seeking or retaining customers. For more information on these payments, please reference the disclosures from the prospectus’ and private placement memorandums. **DO YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?**

Yes. Please visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter:

Ask your financial professional –

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

ADDITIONAL INFORMATION

For additional information about our services, please see our website (www.infinitysecurities.com), or call us at 888-888-5321. If you would like additional, up-to-date information or a copy of this disclosure, please call 888-888-5321, and ask for the Compliance Department.

Conversation Starter:

Ask your financial professional –

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