

Integrated Wealth Management, Inc.

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<https://iwmgameplan.com/>

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ADV Part 2A Brochure

This brochure provides information about the qualifications and business practices of Integrated Wealth Management Inc. If you have any questions about the contents of this brochure, please contact us at 330-896-1644. 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 Integrated Wealth Management Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Integrated Wealth Management Inc., is 141092.

Integrated Wealth Management Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority 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.

The material changes in this brochure from the last annual updating amendment of Integrated Wealth Management Inc. on 03/26/2024 are described below. Material changes relate to Integrated Wealth Management Inc.'s policies, practices or conflicts of interests.

- Integrated Wealth Management Inc. has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- Integrated Wealth Management, Inc. has updated its fee schedule. (Item 5)
- Integrated Wealth Management, Inc. has updated the ownership and President to Benjamin D. Grosko. (Item 4 and 13)
- Integrated Wealth Management Inc. has updated its Assets Under Management. (Item 4)
- Integrated Wealth Management Inc. has updated its fees. (Item 5)

Item 3 Table of Contents

Item 1 Cover Page.....	1
Item 2 Summary of Material Changes.....	2
Item 3 Table of Contents.....	3
Item 4 Advisory Business.....	4
Item 5 Fees and Compensation	6
Item 6 Performance-Based Fees and Side-By-Side Management	8
Item 7 Types of Clients	8
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....	8
Item 9 Disciplinary Information	9
Item 10 Other Financial Industry Activities and Affiliations	9
Item 11 Code of Ethics.....	10
Item 12 Brokerage Practices.....	10
Item 13 Review of Accounts.....	11
Item 14 Client Referrals and Other Compensation	11
Item 15 Custody.....	11
Item 16 Investment Discretion.....	11
Item 17 Voting Client Securities	12
Item 18 Financial Information	12
Additional Information	12

Item 4 Advisory Business

Description of the Advisory Firm

Integrated Wealth Management, Inc., is a registered investment adviser primarily based in Uniontown, Ohio. We were organized in June of 2006 as a corporation under the laws of the State of Ohio. Benjamin M. Grosko, President and 100% owner of Integrated Wealth Management, Inc.

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 individual needs. As used in this brochure, the words "we", "our" and "us" refer to Integrated Wealth Management, Inc., and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

Wealth Management Services

We offer Wealth Management Services, the goal of which is to structure a financial and investment plan designed to grow, preserve, and protect your assets.

Our Wealth Management Services include financial planning, continuous financial management, and portfolio management service as described below. You may elect to retain us for the full spectrum of services offered or you may elect a single service, depending on your needs. We also offer ongoing wealth management services where you receive continuous coaching regarding the management of your financial resources for the forthcoming year, and advice tailored to your specific long-term goals including, but not limited to, business planning, development of corporate assets, and wealth accumulation.

We offer an initial complimentary consultation in which pertinent information about your personal and financial circumstances and objectives are collected, and to determine the scope of the engagement. Wealth Management Services may include a written financial plan that addresses each of your unique circumstances and serves as a guide for financial implementation and asset allocation. Financial plans are based on your financial situation at the time the plan is presented. You are advised that certain assumptions may be made with respect to interest and inflation rates, as well as past trends, historical market performance, and the economy. Past performance is in no way an indication of future results. We cannot offer any guarantees or promises that your financial goals and objectives will be met. We ask that as your financial situation, goals, objectives, or needs change, that you promptly us.

Portfolio Management Services

As part of our Wealth Management Services, we may recommend that you engage our firm for Portfolio Management Services. We provide discretionary and non-discretionary Portfolio Management Services in accordance with your individual investment objectives. If you participate in our discretionary portfolio management services, you must grant our firm discretionary authority to manage your account, which is typically granted by the investment advisory agreement you sign with our firm. Subject to a grant of discretionary authorization, we have the authority and responsibility to formulate investment strategies on your behalf. This authorization includes deciding which securities to buy and sell, when to buy and sell, and in what amounts, in accordance with your investment program, without obtaining your prior consent or approval for each transaction. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing.

If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advise provided by our firm on a non-discretionary basis.

We recommend that our clients allocate investment assets among the various mutual fund asset allocation models, underlying mutual funds, and/or independent investment manager programs offered

through SEI Investments Company ("SEI"), Private Capital, LLC (" ") American Funds, AE Wealth Management, Great-West Financial, The Vanguard Group, Brinker Capital, Mid Atlantic Capital Group, and AE Wealth Management. These are considered global asset management companies. Global asset management companies enable investment advisers such as our firm to offer programs that are not otherwise available to the general public. As part of its overall investment management program, they offer periodic rebalancing of each client's investment assets for the purpose of maintaining the assets in accordance with the client's previously designated percentage (%) asset allocations and investment objectives.

Selection of Other Advisers

We may also recommend that you use the services of a third-party money manager ("MM") to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we may recommend that you engage a specific MM or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the MM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the MM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. Specific financial plans and their implementation are dependent upon your current situation (income, tax levels, and risk tolerance levels) and are used to construct your specific plan to aid in the selection of a portfolio that matches your restrictions, needs, and targets.

You may impose restrictions in investing in certain securities or types of securities in accordance with your values or beliefs. However, if the restrictions deviate from our standard suite of services, we reserve the right to end the relationship.

Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. We recommend AE Wealth Management, which in turn manages a wrap fee program. We also recommend SEI Investments Company ("SEI") which will not manage accounts for our clients under a wrap fee program.

Assets Under Management

As of March 2024, we manage \$139,241,673 in client assets on a discretionary basis.

Item 5 Fees and Compensation

Wealth Management Services

We offer an initial complimentary consultation in which pertinent information about your personal and financial circumstances and objectives is collected, and the scope of the engagement is determined. The fee for the written financial plan ranges from \$500 - \$15,000, depending upon the complexity and scope of the plan, your financial situation, and your objectives. Fees for Corporations and for some individuals with extremely complex objectives that require extensive planning can range from \$15,000 - \$100,000.

We require that the entire fee be paid in advance unless special arrangements are agreed upon. Under no circumstances will we require prepayment of a fee more than six months in advance and in excess of \$1,500, as services will be rendered within six months of the date of contract.

At our discretion, we may offset our Wealth Management Services fees to the extent you implement the advice provided through our Portfolio Management Service.

Portfolio Management Services

The annualized fee schedule for portfolio management services are as follows:

ALL ACCOUNTS OWNED BY THE CLIENT AND MANAGED BY IWM WILL BE AGGREGATED TO DETERMINE A BRACKETED, STEP-UP TIER SYSTEM, IF ANY, TO BE APPLIED TO THE ADVISORY FEE AS OUTLINED IN THE SCHEDULE BELOW. FEES MAY DIFFER BASED ON THE PORTFOLIO MANAGEMENT STYLE IMPLEMENTED.

<u>Account Asset Value</u>	<u>Annual Management Fee Scale</u>
\$0 - \$500,000	1.50%
\$500,000 - \$1,000,000	1.25%
\$1,000,001 - \$2,000,000	1.00%
\$2,000,001 - \$3,000,000	0.85%
Assets over \$3,000,000	0.70%

Our annual fee is negotiable depending upon the market value of your assets under our management and the specific type of investment management services to be rendered. The fee is billed monthly or quarterly in arrears at the end of each quarter based on the market value of the assets on the last day of the quarter. Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter.

The fees charged by SEI and/or AE Wealth Management are exclusive of, and in addition to, our investment management fee. Fees paid by our clients to SEI, and/or AE Wealth Management are established and payable in accordance with the Form ADV Part 2 or other equivalent disclosure document provided to you by SEI, and/or AE Wealth Management. In addition to our investment management fee, the client, relative to all mutual fund purchases, shall also incur charges imposed at the mutual fund level (e.g., management fees and other fund expenses).

We will either invoice you directly for management of fees or payment will be made by SEI, and/or AE Wealth Management as custodians of your funds and securities provided you supply written authorization permitting the fees to be paid directly from the account. We will not have access to your

funds for payment of fees without your written consent. Further, the qualified custodian agrees to deliver a monthly account statement directly to you, showing all disbursements from the account. You are encouraged to review all account statements for accuracy. We will receive a duplicate copy of your statement.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

Either party may terminate the management agreement within five days of the date of acceptance without penalty. After the five-day period, you may terminate the investment advisory agreement by providing 30 days written notice to our firm. The asset allocation fee will be prorated for the quarter in which the termination notice is given, which means that you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid any advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Selection of Other Advisers

We do not charge you a separate fee for the selection of other advisers. We will share in the advisory fee you pay directly to the MM. The advisory fee you pay to the MM is established and payable in accordance with the brochure provided by each MM to whom you are referred. These fees may or may not be negotiable. Our compensation may differ depending upon the individual agreement we have with each MM. As such, a conflict of interest exists where our firm or persons associated with our firm has an incentive to recommend one MM over another MM with whom we have more favorable compensation arrangements or other advisory programs offered by MMs with whom we have less or no compensation arrangements.

You may be required to sign an agreement directly with the recommended MM(s). You may terminate your advisory relationship with the MM according to the terms of your agreement with the MM. You should review each MM's brochure for specific information on how you may terminate your advisory relationship with the MM and how you may receive a refund, if applicable. You should contact the MM directly for questions regarding your advisory agreement with the MM.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds, exchange traded funds, or individual stocks. 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 will 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.

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely

based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

We do not accept performance-based fees or participate in side-by-side management. 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.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. 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 offer investment advisory services to individuals, high net worth individuals, corporate pension and profit-sharing plans, corporations and business entities.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your Account if it falls below a minimum size which, in our sole opinion, is too small to effectively manage.

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

Our Methods of Analysis and Investment Strategies

We employ fundamental, long-term, buy-and-hold philosophies and approaches in our investment selection and implementation strategies. In cooperation with SEI, and/or AE Wealth Management our recommendations are based on publicly available reports, analysis, research materials, education and training, and various subscription services.

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.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Short-Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial

markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Recommendation of Particular Types of Securities

When we are engaged to provide investment advice, your current financial situation, needs, goals, objectives and tolerance for risk are evaluated. Asset allocation and investment policy decisions are made to in conjunction with SEI, and/or AE Wealth Management and in our best judgment to help you achieve your overall financial objectives while matching appropriate risk exposure to the Client's tolerance level. Your portfolio will primarily be invested in Mutual Funds.

Mutual Funds: Mutual funds 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 will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund 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. The returns on mutual funds can be reduced by the costs to manage the funds. 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.

You are advised that we do not provide legal advice or accounting advice.

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.

Item 9 Disciplinary Information

Our firm and its management have been registered and providing investment advisory services since 2006 and do not have any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

We are affiliated with Integrated Planning Inc. and Integrated Benefits Inc., which are both insurance agencies, through common control and ownership. Therefore, persons providing investment advice on behalf of our firm are licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. Please see the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

Michael R. Koly is the Owner of Koly Financial Group, a financial services company. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Integrated Wealth Management, Inc. always acts in the best

interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Integrated Wealth Management, Inc. in such individuals outside capacities.

Benjamin D. Grosko is President and sole shareholder of Integrated Benefits Network of Ohio Inc. representing medical insurance programs for seniors and is a representative of Integrated Planning Company Inc. representing annuities and life insurance products for his clients. In his capacity, he can affect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Grosko for insurance related activities. This presents a conflict of interest because Mr. Grosko may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Recommendation of Other Advisers

We may recommend that you use a third-party adviser ("MM") based on your needs and suitability. We will receive compensation from the MM for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third-party adviser. You are not obligated, contractually or otherwise, to use the services of any MM we recommend.

Item 11 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 of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Item 12 Brokerage Practices

We will not select or recommend brokerage or custodial services to you in relation to the management of your account. You will be provided with SEI, and/or AE Wealth Management's disclosure brochure(s) which has specific information regarding their respective brokerage practices.

We may receive research products and services from either SEI, or AE Wealth Management that may include research, data, financial publications, information about particular companies and industries, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities.

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.

Block Trades

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading") because we do not directly buy and sell securities for our clients' accounts.

Item 13 Review of Accounts

Edward M. Grosko, Benjamin D. Grosko, Michael R. Koly, and other investment adviser representatives of our firm will review their respective clients' accounts on a periodic basis and will conduct account reviews at least annually to ensure the advisory services provided to you and the portfolio mix are consistent with your current 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 may provide you with additional written reports in conjunction with account reviews or upon your request. Reports we provide to you will contain relevant account and/or market-related information such as an inventory of account holdings and account performance, etc. You will receive trade confirmations and monthly or quarterly statements from your account custodian.

Item 14 Client Referrals and Other Compensation

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. 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. You should carefully review account statements for accuracy.

Item 16 Investment Discretion

You may grant our firm discretion over the selection and number of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular security or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to

implement any advice provided by our firm on a non-discretionary basis.

Item 17 Voting Client Securities

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 non-public personal information about you to any non-affiliated 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 non-public 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 non-public 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.

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.

