



COMPANY OVERSIGHT & COMPLIANCE

Midland Trust Company

Midland IRA, Inc. is a third-party administrator with primary offices in Chicago, IL and Fort Myers, FL. Since 2002, Midland IRA's sole business is to provide account holders recordkeeping and custodial services for self-directed retirement accounts. Midland IRA, Inc. is the IRA administrator, and Midland Trust Company is the IRA custodian. Together, Midland IRA, Inc. and Midland Trust Company are referred to as Midland.

Midland is not a fiduciary and does not sell products, nor does it provide investment, legal, or tax advice. Midland Trust Company uses a third party servicing company to help administer client assets. Midland IRA, Inc. is the administrative company that services all assets.

The parent company of Midland has been in business since 1994.

Midland currently holds over two billion dollars in client assets and services over 16,000 accounts.

Midland is staffed with well-trained professionals, many of whom have been awarded the designation of Certified IRA Services Professional (CISP) by the American Banking Association's Institute of Certified Bankers.

Midland uses a combination of methods to ensure the security of client information. This includes a firewall, encryption, a rigorous internal password policy, lockout hours where the systems are shut down, off-site backup (in preparation of natural disasters), and a locked location for our servers.

Midland uses Centennial Bank for most day-to-day cash transactions with back up banking enabled with Dacotah Bank.

Midland has an A+ rating with the Better Business Bureau (BBB).



COMPANY OVERSIGHT & COMPLIANCE

Midland Trust Company

INTRODUCTION

Midland IRA, Inc. is a third-party administrator with its primary offices in Fort Myers, FL, and its Sales Office in Chicago, Illinois. Midland's sole business is to provide account holders recordkeeping and custodial services for self-directed retirement accounts. Midland does not sell products, nor does it provide investment, legal, or tax advice.

Midland is not a fiduciary. Midland IRA's role as the administrator of self-directed retirement accounts is non-discretionary and/or administrative in nature. The account holder or his/her authorized representative must direct all investment transactions and choose the investment(s) for the account. Midland has no responsibility or involvement in selecting or evaluating any investment.

REGULATORY OVERSIGHT

Midland Trust Company serves as the custodian for Midland accounts (including all IRAs, HSAs, and Coverdell ESAs but excluding all qualified plans such as the Individual 401(k) plans). Midland Trust Company is a non-depository trust company regulated by the South Dakota Division of Banking.

All relevant Midland Trust Company records and transactions, as well as procedures and policies, are subject to examination and approval by Midland Trust Company and the South Dakota Division of Banking. As required by South Dakota regulations, Midland Trust Company accounts are subject to audit by the State of South Dakota.

Additionally, Midland Trust Company is subject to oversight by quarterly trust committee meetings, as well as monthly audit oversight committee meetings composed of Midland IRA, Inc. management, Midland Trust Company management, and Midland Trust Company compliance officers. Midland IRA, Inc. provides monthly reports for and attends the monthly audit oversight committee meetings to review activities, approve policy changes and provide ongoing oversight feedback. Although Midland IRA, Inc. performs all services for the accounts, ultimate control of the assets, including undirected cash, rests with Midland Trust Company as the custodian. Physical account assets are held in Midland Trust's vault.



COMPANY OVERSIGHT & COMPLIANCE

Midland Trust Company

SAFEKEEPING OF CLIENT INFORMATION

Midland uses a combination of methods to ensure the security of client information. This security includes a firewall, encryption, a rigorous internal password policy, lockout hours where the systems are shut down, an offsite backup (in preparation of natural disasters), and a locked location for our servers. We also have a professional shredding service to dispose of important documentation.

UNDIRECTED CASH

Undirected (uninvested) cash at Midland is handled with security as the first priority. All undirected client cash is reconciled daily and reviewed by Midland Trust Company. Please see Form 5305 for complete details.

Midland uses various national and state banks for all day-to-day cash transactions related to account holder requests. Transactions may include: accepting deposits and/or disbursing funds by check, ACH, or wire transfer. The main banking relationships include Centennial Bank, Dacotah Bank, First Bank and Trust, and Sanibel Captiva Community Bank.

Alternative investments made into real estate, promissory notes, private equity, and other non-traditional investments are not insured against loss in value by the Federal Deposit Insurance Corporation (FDIC).

ASSET TITLING

For an IRA-owned asset to be maintained in a tax-deferred (or tax-free, in the case of a Roth IRA) status, the assets must be titled directly to the custodian or its nominee/agent. Any asset owned inside a Midland Trust Company account must be titled as Midland Trust Company as Custodian FBO (for the benefit of) the account holder's name and his/her Midland account number.

Midland has established two separate and segregated entities with the IRS: one entity is the operating business that provides administrative services, and the second is the trust that holds all client assets and bank accounts. The assets and bank accounts between the two entities are never comingled. Each entity has its own Federal Tax ID.

Should Midland Trust be unable to perform its administrative duties or no longer be in business, Midland Trust Company would assume those administrative duties. Should Midland Trust Company be unable to perform its duties or no longer be in business, the account agreement allows for a smooth transition to an alternate self-directed IRA custodian.



COMPANY OVERSIGHT & COMPLIANCE

Midland Trust Company

INVESTOR AWARENESS

Account holders are strongly encouraged to consult with a competent tax advisor before making any investment decision. All investments involve risk. There are no guarantees that alternative (non-traditional) investments will increase returns and/or minimize loss. Like traditional investments, there are inherent risks of investing in alternative assets. See SEC Investor Alert: **Self-Directed IRAs and the Risk of Fraud** (sec.gov/investor/alerts/sdira.pdf).

RELEVANT CONTACT INFORMATION

Midland Trust Company

330 N. Main Street, Suite 203 - Sioux Falls, SD 57103

Midland IRA, Inc.

Headquarters: 1520 Royal Palm Sq. Blvd., Suite 320 - Fort Myers, FL 33919

Sales: 135 S. LaSalle St., Suite 2150 - Chicago, IL 60603

Principals

Dave Owens, CPA - dowens@midlandtrust.com

Brandon Hall, CISP - bhall@midlandtrust.com

Senior Management Team Bios (midlandtrust.com/meet-our-team)

FL Secretary of State Corporate Filings (goo.gl/jyeKoa)

Main Deposit Banking Relationship - Centennial Bank - Member FDIC

12670 Creekside Ln., Suite 101 - Fort Myers, FL 33919 (239) 332-5115

South Dakota Division of Banking

1601 N. Harrison Ave., #1 - Pierre, SD 57501