



## ERISA 3(38) Fiduciary Service from IRON FINANCIAL

For more information,  
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### How does this work?

When IRON is engaged as the 3(38) Investment Fiduciary, IRON is responsible for all plan asset management, including;

- Selecting, monitoring, and replacing all fund options beginning with mapping current investments into IRON's recommended funds.
- The Plan Sponsor may select from active or passive lineups to provide an investment lineup that best reflects their participant dynamics.

### What does this mean?

- This is the most comprehensive transfer of Plan Sponsor liability for investment related issues available in the industry today.
- The Trustee's responsibility shifts solely to monitoring the 3(38) Fiduciary.
- Both the Plan Sponsor and the selling Advisor/Broker are removed **entirely** from the investment selection, monitoring, and replacement process.

### Deliverables

IRON provides the plan with a set of differentiated deliverables:

- **Investment Policy Statement (IPS)** – IRON's IPS is detailed, plan specific, and is delivered directly to the Plan Sponsor and the Advisor. Most other solutions have a generic IPS for the platform. Most other platforms do not deliver the IPS to the Plan Sponsor, nor are they plan specific. The Plan Sponsor must download a generic version from the web.
- **Quarterly Fiduciary Report (QFR)** – IRON's QFR is plan specific and delivered to the Plan Sponsor and the advisor. Most others are generic and not delivered.
- **Optional Quarterly Educational Newsletter** – IRON is one of the few that offers quarterly education via a newsletter. Our newsletter is platform specific as to funds and returns.

### CEFEX Certified

IRON is a platform level ERISA 3(38) Fiduciary that has received a CEFEX accreditation. Industry confirmation of our methods, processes, and metrics is an important factor to Broker Dealer firms and Plan Sponsors. Many ERISA attorneys caution Plan Sponsors that the hiring of an imprudent 3(38) does not mitigate risk, it adds to it.

### Independence

IRON is independently owned and operated. We are not affiliated with any platform or recommended funds. IRON does not use proprietary products as an ERISA 3(38) Fiduciary. We do not default a participant into a platform owned or sub-advised mutual fund. Some other 3(38)s are owned by the platform that offers their service.

- Many 3(38)s use proprietary funds
- Most platform level 3(38) Investment Fiduciaries are required to use platform owned funds or sub-advised funds

### Fee Schedule

Plans under 5 million with models / without models – 10 bps. / 7bps.  
Plans over 5 million - 5bps.