

Item 1. Cover Page

INVESTMENT GROWTH MANAGEMENT, INC.

Long-Term Portfolio Management

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This brochure (Form ADV Part 2A) provides information about the qualifications and business practices of Investment Growth Management. The information in this brochure has not been approved by the commission or the state of California and does not imply any certain level of skill or training.

Investment Growth Management, Inc is an S-Corporation. In this brochure Investment Growth Management, Inc is referred to as IGM and as the adviser.

Item 2. Material Changes

This document has been updated and revised according to the SEC Release No. IA-3060; file No. S7-10-00, dated 07-28-2010. It replaces the previous Form ADV Part 2 dated 08-10-2022.

IGM's amendment dated 01/12/2023 provided the following changes:

Item 1: Update of Financial Planning Services and Fees

Item 2: Addition of Retirement Plan Participant Management Services

Item 3: Service Name Change of Personal Bookkeeping Service to Personal Cash Flow Tracking and Analysis Service

Item 4: Update of Assets Under Management as of Year End 2022.

Item 3. Table of Contents

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Item 4. Advisory Business

Investment Growth Management (referred to as “IGM”), has been a registered investment advisor since 1990.

The goal of IGM is to structure a long term diversified investment portfolio, that attempts to maximize an expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of investments in various asset classes of equity and individual debt securities.

Levels of portfolio risk and expected return are specific for each client and are generated from a client’s individual needs, goals, circumstances, time frame, and risk tolerance.

The primary objectives to managing the portfolio are to minimize the risk of volatile market swings, and to achieve capital growth, and income.

IGM does not offer or sell any type of product, is not a broker or dealer, and is not affiliated with any person in the securities business or insurance companies. IGM's sole compensation is derived from client fees, not from securities transactions or products sold.

Either party, upon a ten day written notice to the other, may cancel the advisory agreement.

All accounts are reviewed daily on the discount broker’s web site and a computer program as on the attached samples.

The assets managed by IGM, under limited power of attorney, will be invested in primarily moderate/conservative securities, and Mutual Funds that range from growth to conservative allocation, which invest in quality stocks and bonds, and well managed Money Market Funds. Based on a client's financial situation IGM may invest in individual United States government securities, certificates of deposit, corporate debt securities, equity securities, closed end mutual funds, ETFs, ETNs, municipal securities, and trusts.

Investment Philosophy:

Securities are bought and sold at the discretion of the adviser based on the best interests and suitability related to the client’s age, risk tolerance, financial goals, and market conditions. Investments may include all or some combination of equity, debt securities, and mutual funds. It is at the sole discretion of the Advisor as to the timing of when to buy and sell securities. On-going assessment of the client’s factors, as mentioned, are monitored, and securities are adjusted accordingly when changes occur.

IGM may select individual securities and mutual funds, or the combination of the two, as the primary investment vehicle for appreciation. Income clients may be concentrated in individual securities more than growth investors may. These investments are closer tied to interest rates than the stock market.

PLAN 1 ** Lump Sum Investing **
Investing for growth

How to invest with IGM:

The minimum investment amount is \$75,000. IGM will provide instructions and paper work to open an account with the broker, a discount brokerage service, in your name. Under agreement, IGM will be given limited power of attorney. IGM, and only IGM, will trade for the account. IGM will not be authorized to withdraw funds, open or close accounts in your name, unless IGM attains the authority from you and receives written and verbal consent.

Statements:

You will receive a monthly statement from the both (custodian/broker) and IGM. The unique features include Year to Date dollar amount and percentage, Inception to Date dollar amount and percentage, Dividends Year to Date and Inception to Date dollar amount, and the overall totals. You will also receive an annual letter which explains your past performance and IGM's opinion on the markets.

Fees:

**Plan 1 Fee Tier
Schedule**

| Assets Under Management | Annual Fee |
|---------------------------------|-------------------|
| \$75,000- \$1,499,999 | 1.00% |
| \$1,500,000-\$3,000,000 | 0.80% |
| \$3,000,000-\$5,000,000 | 0.70% |
| \$5,000,000-\$10,000,000 | 0.60% |
| Above \$10,000,000 | 0.50% |

The management fee is calculated at the end of each quarter by taking one fourth of the annual fee from the total portfolio value. Fees are prorated on investments withdrawn and/or if added as a one-time lump sum to the portfolio. The first fee for a new client or new funds added will be prorated on a one time basis, in order to reach dates that will occur on the last day of each calendar quarter.

Withdrawals:

Although IGM encourages assets placed under management to be long term investments, 3 years minimum, assets are readily available without penalties or extra fees from IGM. Your assets are subject to the normal rules and penalties of retirement type accounts.

PLAN 2 ** Automatic Dollar Cost Averaging Savings Plan **
Investing for growth by continually adding funds

Investors that generate monthly excess cash or income after personal expenses should consider the IGM Automatic Dollar Cost Averaging Savings Plan.

How it works:

Minimum investment amount is \$50,000, and \$100 per month additions, or annual additions must calculate to 2% of total invested principle when invested amount is \$100,000 or over.

Please note that IGM may take on accounts that do not have the required minimum on any plan under the following circumstances: minimum is expected to be met in a 2 to 3-year time horizon, or client can demonstrate that additions to the account will meet minimums even though the time frame would be beyond the 2 to 3 year period.

IGM will select mutual/money market funds through a discount broker or a mutual fund family, provide instructions and paper work to open accounts, and assist you to set up monthly automatic transfers from your personal banking account or Payroll, to your mutual/money market funds without transaction fees.

Monthly transfers take place on the same day each month. Using an example of \$100.00 monthly investments, IGM will direct the investor to transfer the amount into a mutual/money market fund. Dollar cost averaging in the mutual fund is a conservative low risk approach to long term investing in the market.

This investing strategy, combined with the "Power of Compounding" (see tables), will allow you to exceed the gains you can make in a lump sum approach while reducing your level of risk. The IGM savings plan will provide you excellent long-term growth appreciation to meet your savings goals.

Statements:

You will receive a monthly statement from the both (custodian/broker) and IGM. The unique features include Year to Date dollar amount and percentage, Inception to Date dollar amount and percentage, Dividends Year to Date and Inception to Date dollar amount, and the overall totals. You will also receive an annual letter which explains your past performance and IGM's opinion on the markets.

Fees:

The management fee is 0.22 % of the total portfolio value, calculated at the end of each quarter. Fees are prorated on investments withdrawn and/or if added as a one-time lump sum to the portfolio. The first fee for a new client or new funds added will be prorated on a one time basis, in order to reach dates that will occur on the last day of each calendar quarter.

Withdrawals:

Although IGM encourages assets placed under management to be long term investments, 3 years minimum, assets are readily available without penalties or extra fees from IGM. Your assets are subject to the normal rules and penalties of retirement type accounts.

POWER of COMPOUNDING

| | | | | | | | |
|------------------|-----------|--|-------------------|--|-------------------|--|--|
| Annual Yield: | 10% | | 10% | | 10% | | |
| Starting Amount: | \$2,000 | | \$2000 & \$125/Mo | | \$5000 & \$175/Mo | | |
| | Grows to: | | Grows to: | | Grows to: | | |
| In 5 years | \$ 3,221 | | \$ 12,791 | | \$ 21,451 | | |
| In 10 years | \$ 5,187 | | \$ 30,170 | | \$ 47,945 | | |
| In 15 years | \$ 8,354 | | \$ 58,160 | | \$ 90,613 | | |
| In 20 years | \$ 13,455 | | \$ 103,237 | | \$ 159,332 | | |
| | | | | | | | |
| | | | | | | | |
| Annual Yield: | 15% | | 15% | | 15% | | |
| Starting Amount: | \$2,000 | | \$2000 & \$125/Mo | | \$5000 & \$175/Mo | | |
| | Grows to: | | Grows to: | | Grows to: | | |
| In 5 years | \$ 4,022 | | \$ 14,814 | | \$ 25,164 | | |
| In 10 years | \$ 8,091 | | \$ 40,537 | | \$ 65,723 | | |
| In 15 years | \$ 16,274 | | \$ 92,427 | | \$ 147,300 | | |
| In 20 years | \$ 32,733 | | \$ 196,696 | | \$ 311,381 | | |

PLAN 3 ** Investing for Income **

Strategy:

To invest primarily for income and secondarily for growth. Client may also choose a balance or an allocation between Plans 1 and 2. For example, 50% stock/mutual funds and 50% conservative individual securities such as bonds.

How it Works:

The minimum investment is \$75,000. Plan 3 is suited for clients that are planning to take income from the account or for conservative investors who do not want income but seek high quality, less volatile investments.

Statements:

You will receive a monthly statement from the both (custodian/broker) and IGM. The unique features include Year to Date dollar amount and percentage, Inception to Date dollar amount and percentage, Dividends Year to Date and Inception to Date dollar amount, and the overall totals. You will also receive an annual letter which explains your past performance and IGM's opinion on the markets.

Fees:

Fees are generated on a percentage of a client's total assets managed by IGM. Fees are based on asset value at the end of each quarter. The fee can range from .50 % to 1% annually based on the following criteria; clients receiving the lower range fee would be in an fixed income portfolio in which they would be receiving distributions over 75% of their total income. Clients who receive less than 75% of their income may be offered to be invoiced on the combination of the flat fee and a percentage of total value. The total fee to the client would not exceed 1%, nor would it be below .50% annually. Clients not receiving income would be on a straight percentage fee, and would have a fee in the upper range of .50% - 1%. The fee arrangement with the client will be based on the client's financial condition to pay fees, the value of the portfolio, types of securities held, client satisfaction, and the flexibility of the advisor to compete with other firms. All fees are prorated quarterly, and calculated on asset value for fees based off a percentage. Fees are prorated on investments when they are withdrawn or added from the portfolio. The first fee and new funds added for a client will be prorated on a one time basis, in order to reach dates that will occur on the last day of each calendar quarter.

Withdrawals:

Although IGM encourages assets placed under management to be long term investments, 3 years minimum, assets are readily available without penalties or extra fees from IGM. Your assets are subject to the normal rules and penalties of retirement type accounts.

****IGM Financial Planning ****

IGM's Financial Planning is designed for those who do not have current investable assets or do not meet our minimum fee from investable assets and financial planning, yet would like to have financial planning.

After a thorough review of all pertinent Client provided data and objectives and mutually agreed upon assumptions, the Adviser will analyze the Client's financial situation including, but not limited to: net worth (assets and liabilities), corporate benefits, personal budget scenarios, cash flow strategies (current and projected), retirement planning, risk management, investment portfolio, specific financial needs as determined by the client, and tax and estate planning considerations.

Upon completion of the analysis, the Adviser will make recommendations including suggested strategies to achieve Client's stated objectives. The Adviser will provide Client with a written report of all analysis and recommendations.

The financial planning service will include at least 2 semi-annual meetings with the advisor at the client's discretion. The client will also have access to a third-party financial tracking / planning software offered by Investment Growth Management. The term of this agreement shall be from the date hereof until cancelled by either party upon ten days written notice to the other.

Fees:

Annual Fee: Range From \$1,000 - \$3,000, billed quarterly.

Annual fee amount is dependent on complexity of client's financial planning needs.

If the client has assets under management (AUM) with the Advisor and the percentage of assets fees reach a quarterly dollar amount for financial planning, fees will be solely withdrawn from the investment account.

Financial planning services include general personal financial planning topics. Additional work that is above and beyond the scope of service agreed upon by the client and the advisor will be billed at an hourly rate of \$150 per hour.

Adviser's financial planning fees are negotiable and arrangements with any client may differ from those described above.

The fees charged by Adviser are solely for the preparation and oversight of Financial Planning, and/ or Financial Planning combined with Investment Management. IGM does not receive any fees or commissions upon implementation of any securities or other recommendations.

Hourly Fee:

\$150 per hour for needs based planning

*****Retirement Plan Participant Account Management*****

We use Pontera, a third party platform, to facilitate the management of held-away assets such as defined contribution plan participant accounts like 401(k)s, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once the Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. Client account(s) will be reviewed at least quarterly, and allocation changes will be made as deemed necessary. The goal is to improve account performance over time and manage internal fees that harm account performance.

The fee for our participant account management program is 0.5% annually, billed quarterly at .125% based on the account value on the last date of the quarter. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance.

The fees will be assigned to the client's taxable account. If a client does not have a taxable account, they will open a new taxable account and create a monthly transfer into the account to cover the participant account management fee. After the fee is deducted any remaining amount will be invested based their investment profile.

****Business Retirement Plan Advisory Services****

IGMs business retirement plan services are designed for small to mid size business who either have a current retirement plan in place or are looking to start-up a retirement plan.

How it works:

IGM acts as the advisor for business retirement plans and supports the plan sponsor by providing investment selection, plan guidance, and participant education. IGM uses Newport Group retirement plan services. Newport Group acts as the plan administrator, record-keeper, and custodian.

IGM retirement advisory services:

- Investment menu design
- Plan design consulting
- Assist in plan creation/conversion process
- Investment monitoring
- Replacements/fund manager searches/screens
- Provider fee and service reviews
- Participant education presentations
- Employee meetings

NewPort Group:

- Plan design support.
- Signature-ready plan documents and supporting forms.
- Based on stated goals Full-service record-keeping and plan. administration Compliance testing.
- Form 5500 preparation.
- Downloadable reports.
- Asset custody services.
- Easy access to plan information online or by phone.
- Auto-enroll and auto-increase programs.
- Dedicated relationship support.
- Plan sponsor-focused website with streamlined payroll administration, participant enrollment, and reporting.

Retirement Plan Service Fees

IGM Fee Schedule:

Start up fee is a flat rate and to be invoiced during the initiation phase.

Fees are billed quarterly in arrears.

Such quarterly period is the “Billing Period.”

Adviser will invoice client a flat quarterly fee. When the market value of the plan assets exceeds thresholds as defined in the advisory agreement, fee can be deducted from plan assets.

For purposes of determining and calculating fees, Plan assets are valued net of Excluded Assets as of the last day of a calendar quarter, unless otherwise indicated.

The annual fee for services shall be calculated as follows:

Start up cost: \$300

| Plan Assets \$ Annual Fee | Annual Fee |
|---------------------------|---------------------------------------------------|
| Up to 500,000 | \$2000 flat annual fee, billed quarterly at \$500 |
| 500,000 – 999,999 | 0.65% of total assets, billed quarterly |
| 1,000,000 - 4,999,999 | 0.5% of total assets billed quarterly |
| 5,000,000 + | 0.4% of total assets, billed quarterly |

New Port Group Retirement Plan Fees:

The plan incurs an annual administration expense of up to 0.55% of plan assets based on a tiered fee schedule or a minimum fee of \$5000, whichever is greater.

If the Plan incurs any additional expenses for services such as legal or accounting services, such fees will be deducted from Plan accounts on a pro rata basis.

****Personal Cash Flow Tracking and Analysis Service****

How it Works:

IGM's Personal Cash Flow Tracking and Analysis Service will track and categorize monthly expense and cash levels across all client personal banking and credit card accounts.

The Advisor will send monthly cash flow summary reports that measure spending and income compared to a budget for client to review. Monthly spending reports will be sent along with the client's monthly investment statement.

Fees:

Personal Cash Flow Tracking and Analysis services are offered on an hour fee basis.

The hourly rate is \$120 an hour and will be invoiced each month. The fee's will be deducted from the client's investments accounts.

The client is to review the invoice and verify that the correct amount is withdrawn from the account each month.

Personal Cash Flow Tracking and Analysis Service fees are negotiable and arrangements with any client may differ from those described above.

These fees charged by Adviser are solely for the Personal Cash Flow Tracking and Analysis Service.

****Educational Presentations****

IGM will give educational presentations. These presentations are for educational and promotional purposes. During these presentations IGM will review the following topics:

- Financial industry overview.
- Education of general investing principals and strategies.
- Review of financial planning process.
- Retirement planning with budget and cash flow analysis.
- Information our business (Investment Growth Management).

IGM is not limited to and may add or subtract the topics listed above as deemed appropriate for a presentation's audience.

Assets Under Management:

Discretionary assets under management as of 12/31/2022 is \$26,210,560.

Non-Discretionary assets under management as of 12/31/2022 is \$1,592,368

Item 5. Fees and Compensation

Adviser's annual service fee will be based on client's assets under management

Plan 1: TIERED FEE

| Assets Under Management | Annual Fee |
|--------------------------------|-------------------|
| \$75,000- \$1,499,999 | 1.00% |
| \$1,500,000-\$3,000,000 | 0.80% |
| \$3,000,000-\$5,000,000 | 0.70% |
| \$5,000,000-\$10,000,000 | 0.60% |
| Above \$10,000,000 | 0.50% |

Plan 2 Eighty-eight tenths of one percent (0.88%)

Plan 3 Fifty tenths of a percent (.50%) to one percent (1%)

Fees are to be payable quarterly, based on the total assets of the portfolio at the end of the last business day of each quarter. Deduction of fees from client accounts is mutually agreed upon between IGM and the client through limited power of attorney as stated on the TD Ameritrade account form. Limited power of attorney allows the adviser to invoice fees, trade the account, and issue instructions to TD Ameritrade based on the client's request.

Client accounts are held at TD Ameritrade. TD Ameritrade is the custodian of the clients' assets. Fees associated with TD Ameritrade include their trading fee. Bond purchase fees are included in the price of the bonds. Equities have a minimal transaction cost of \$9.99 per trade. The fee for a mutual fund transaction is \$24.99 per transaction. However, the majority of investments in mutual funds by IGM are 'No Transaction Fee' (NTF) funds.

Mutual Fund expense fees are included in the price of the Mutual Fund. These fees and costs are applied by the Mutual Fund management company.

IGM does not receive compensation from the sale of securities or other investment products.

Financial Planning Fees

Ongoing Subscription Fee:

Annual Fee: \$1,000 - \$3,000, billed quarterly.

Hourly Fee:

\$150 per hour for needs-based planning

Business Retirement Plan Service Fees

IGM Fee Schedule:

Start up fee is a flat rate and to be invoiced during the initiation phase.

Fees are billed quarterly in arrears.

Such quarterly period is the “Billing Period.”

Adviser will invoice client a flat quarterly fee. When the market value of the plan assets exceeds thresholds as defined in the advisory agreement, fee can be deducted from plan assets.

For purposes of determining and calculating fees, Plan assets are valued net of Excluded Assets as of the last day of a calendar quarter, unless otherwise indicated.

The annual fee for services shall be calculated as follows:

Startup cost: \$300

| Plan Assets \$ Annual Fee | Annual Fee |
|---------------------------|---------------------------------------------------|
| Up to 500,000 | \$2000 flat annual fee, billed quarterly at \$500 |
| 500,000 – 999,999 | 0.65% of total assets, billed quarterly |
| 1,000,000 - 4,999,999 | 0.5% of total assets billed quarterly |
| 5,000,000 + | 0.4% of total assets, billed quarterly |

Newport Group Retirement Plan Fees:

The plan incurs an annual administration expense of up to 0.55% of plan assets based on a tiered fee schedule or a minimum fee of \$5000, whichever is greater.

If the Plan incurs any additional expenses for services such as legal or accounting services, such fees will be deducted from Plan accounts on a pro rata basis.

IGM Personal Cash Flow Tracking and Analysis Service:

Personal Cash Flow Tracking and Analysis Service services are offered on an hour fee basis. The hourly rate is \$120 an hour and will be invoiced each month. The fee's will be deducted from the client's investments accounts.

The client is to review the invoice and verify that the correct amount is withdrawn from the account each month. Adviser's bookkeeping fees are negotiable and arrangements with any client may differ from those described above. These fees charged by Adviser are solely for the Bookkeeping Service.

IGM Educational Presentation Fees:

IGM charges no fees for educational presentations

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

Investment Growth Management does not charge performance-based fees, nor does it have a supervised person who manages an account that pays such fees to disclose this fact.

IGM bases compensation on percentage of assets, invoiced quarterly, regardless of whether assets have increased or decreased from the previous quarter (ref Item 5.).

Item 7. Types of Clients

Types of clients include individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, high net worth individuals, businesses entities, and corporations.

The minimum amount of money to open an account for Plans 1 and 3 is \$75,000, for Plan 2 is \$50,000 (ref Item 4). Once an account is opened, there is no minimum amount to maintain it.

Clients time horizon must be long term and at least a 3-year minimum.

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

Investment strategies are based on clients' individual needs, goals, circumstances, time frame, and risk tolerance.

Once an investment strategy has been mutually established between IGM and the client, an asset allocation is put in place. Individual securities are then purchased for the client's account.

Research for individual securities and mutual funds is performed on internet programs using screening software that identifies performance, financial measurements and valuation measurements. Also selection of individual securities is based on newsletter and analyst's recommendations, articles and company information.

The main types of investments are stocks, debt securities, mutual funds, exchange traded funds and exchange traded notes. None of these investments are guaranteed. Investing in individual securities and mutual funds involves the risk of loss based on individual company and fund performance and economic conditions.

Risk of loss is mitigated by creating a portfolio that is diversified in industries and companies and by not having a high concentration of investments in any one industry and/or any one company.

Item 9. Disciplinary Information

Investment Growth Management has not had any legal or disciplinary events since the start of the company in 1990.

Item 10. Other Financial Industry Activities and Affiliations

Investment Growth Management has no relationship with financial industry participants.

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

IGM (the adviser) is unbiased in selecting investment securities and is not influenced by financial industry entities or individuals. Nor is the adviser affiliated with any financial institutions or companies.

The adviser practices these core values:

- Honesty
- Accuracy
- Integrity
- Promptness to advise clients on severe market conditions and security losses
- Avoidance of conflicts of interest

The adviser may be investing in the same securities as the clients. This is only deemed as a conflict of interest if the adviser is doing so to influence market pricing. The influence of market pricing rarely occurs due to the amount of investment and if it is made known to the adviser that pricing has been influenced, the adviser will cease to make trades in his own account.

In all purchasing and selling contracts, the clients' interests come before the adviser's and the adviser's trades are done last.

Item 12. Brokerage Practices

IGM uses one broker, TD Ameritrade. IGM uses the institutional services of TD Ameritrade. Fees and commissions are the same for IGM as they are for individuals. TD Ameritrade provides services that are typically made available to institutional investment managers and generally are not offered to retail customers. These services include duplicate client statements and confirmations, invoicing services, and the ability to have advisory fees deducted directly from client accounts.

Services provided by TD Ameritrade to IGM include research on products, information on security trading and account set-ups, and technical support. (See additional information of page 12)

There are no formal soft dollar practices in which the adviser is allowed additional services, products or fees related to client accounts and/or transactions.

There is no compensation to TD Ameritrade for client referrals.

Trades are done both for individual accounts and aggregation. There are no cost or fee advantages to trading individually or in aggregation.

Item 13. Review of Accounts

Client accounts are reviewed on a regular basis. All securities are posted on the adviser's Yahoo account and are viewed and screened at least once a day. All accounts of all clients are also viewed by the adviser on TD Ameritrade's consolidated webpage for IGM. Accounts are reconciled once a month. The broker, TD Ameritrade, provides clients with monthly statements, either via electronic or paper form. IGM provides clients with a separate statement which reconciles values, holdings and asset allocations to the TD Ameritrade statement. This reconciliation process is considered as an additional account review.

Item 14. Client Referrals and Other Compensation

IGM does not receive or pay out compensation from client referrals. IGM can receive client referrals based upon the State of CA requirements, in that compensation agreements can be negotiated between registered investment advisers only. Currently there are no agreements in place.

IGM participates in the TD Ameritrade Institutional Program. We receive services that include custody of client securities, trade execution and clearance and settlement of transactions. The Institutional Program provides additional economic benefits to IGM that are not typically available to TD Ameritrade retail investors. There is no direct link between IGM's participation in the program and the investment advice it gives to its clients.

The economic benefits include the following products and services, which are provided without cost or at a discount:

- Receipt of duplicate client statements and confirmations
- Research-related products and tools
- Consulting services
- The ability to have advisory fees deducted directly from client accounts
- Access to an electronic communications network for client order entry and account information
- Discounts on compliance, marketing, research and technology
- Practice management products or services provided to IGM by third-party vendors
- Business consulting and professional services received by IGM (may be paid for by TD Ameritrade)

Some of the products and services made available by TD Ameritrade through the Institutional Program may benefit IGM but may not benefit client accounts. Other services made available by TD Ameritrade are intended to help IGM manage and further develop our business enterprise. These products or services may assist us in managing and administering client accounts. The benefits received by IGM through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Therefore, receiving these economic benefits creates a potential conflict of interest and may indirectly influence IGM to recommend TD Ameritrade to clients for custody and brokerage services.

Item 15. Custody

Client accounts are held at TD Ameritrade. TD Ameritrade is the custodian of the clients' assets. The client provides IGM with limited power of attorney. Limited power of attorney allows the adviser to invoice fees, trade the account, and issue instructions to TD Ameritrade based on the client's request.

Clients receive statements directly from TD Ameritrade. They also receive statements from IGM. All clients should carefully review the account statements they receive from both parties, as well as the invoice fees from IGM, for accuracy. Comparing statements will allow clients to determine whether account transactions, including deductions to pay advisory fees, are proper.

Item 16. Investment Discretion

IGM has investment discretion, through limited power of attorney, to invoice fees and select securities within the agreement between the client and IGM based upon the mutually agreed upon investment strategy. Due to investment discretion, IGM does not need to contact the client upon making trades as long as it is within the investment strategy agreement. If the investment is outside the agreement, then the adviser will contact the client for permission.

The investment strategy agreement is agreed upon based on the client's investment goals and risk tolerance. This agreement is documented on the Advisor Agreement Form.

Item 17. Voting Client Securities

IGM does not have the authority to vote client proxies. Nor does IGM advise clients on how to vote proxies. IGM will provide information to clients upon inquiries.

Item 18. Financial Information

The adviser does not require prepayment of fees. There are no financial conditions that would impair the adviser's ability to meet the clients' service and portfolio management requirements.

Item 19. Requirements for State Registered Advisors

Michael J. Redlick, President & Portfolio Manager

BUSINESS EXPERIENCE

| | |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1990 to present: | Registered Investment Adviser, since 1990. Formed Investment Growth Management in 1990. |
| 2003 to present | Certified Real Estate Appraiser |
| 1985 to 2003: | Safeway Stores Inc., Inventory Control Manager Research Analyst, Senior Research Analyst, Logistics Planning Analyst, Transportation and Distribution. Service Operations manager |
| 1980 to 1985 | A. Cessena & Associates, Tariff Manager. |

EDUCATION

| | |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| 1983 | Bachelor of Science degree, Business Administration. Dual concentration - Marketing and Transportation. San Francisco State University. |
| 1979 | Associate of Arts degree. Skyline College, San Bruno, CA |

Andrew J. Redlick, CFP® Co-President, Investment Manager & Financial Planner

BUSINESS EXPERIENCE

2022 to present **Investment Growth Management, Inc.**
Co- President
Investment Manager & Financial Planner

2014 to 2022 **Investment Growth Management**
VP, Operations
Associate Investment Manager
Investment Adviser Representative

EDUCATION

2013 Bachelor of Science degree,
Business Administration.
concentration – Finance minor-
Economics
Sonoma State University

2011 Associate of Arts degree.
Diablo Valley College

Additional Information

Michael J. Redlick is a Residential Appraiser and currently performs residential appraisals. This activity is not a conflict of interest to the investment advisor activities. Michael will spend approximately 20 hours per week.

Neither the IGM nor its management persons are compensated for advisory services with performance based fees.

Neither the IGM nor its management persons have been the subject of the type of disciplinary event that warrants disclosure pursuant to this Item.

Neither the IGM nor its management persons have a material relationship or arrangement with any issuers of securities.

ADV Part 2B Brochure Supplement

Item 1. Cover Page

INVESTMENT GROWTH MANAGEMENT, INC

Long Term Portfolio Management

Michael J. Redlick, President & Chief Investment Manager

Andrew J. Redlick, Vice-President Operations, Associate Investment Manager

320 Chardonnay Circle, Clayton, CA 94517

M.Redlick cell 925-588-4743 / A.Redlick cell 925-759-1507

<http://www.investmentgrowthmanagement.com>

This Brochure Supplement provides information about Michael Redlick and Andrew Redlick that supplements the Investment Growth Management, Inc Brochure. You should have received a copy of that Brochure. Please contact Michael Redlick at (925) 588-4743 or redlick@comcast.net if you did not receive Investment Growth Management, Inc's Brochure or if you have any questions about the content of this supplement.

Investment Growth Management, Inc. (IGM) is an S-Corporation. Michael J. Redlick is a Co-President and chief investment manager. Andrew Redlick is a Co-President and Investment Manager & Financial Planner.

Michael J. Redlick, President & Portfolio Manager

Item 2. Educational Background and Business Experience

Birth date: 1-28-59

BUSINESS EXPERIENCE

| | |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1990 to present: | Registered Investment Adviser, since 1990. Formed Investment Growth Management in 1990. |
| 2003 to present | Certified Real Estate Appraiser |
| 1985 to 2003: | Safeway Stores Inc., Inventory Control Manager Research Analyst, Senior Research Analyst, Logistics Planning Analyst, Transportation and Distribution. Service Operations manager |
| 1980 to 1985 | A. Cessena & Associates, Tariff Manager. |

EDUCATION

| | |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| 1983 | Bachelor of Science degree, Business Administration. Dual concentration - Marketing and Transportation. San Francisco State University. |
| 1979 | Associate of Arts degree. Skyline College, San Bruno, CA |

Item 3. Disciplinary Information

There are no legal or disciplinary events that have taken place since the formation of the company in 1990.

Item 4. Other Business Activities

There are no other investment related businesses that the advisor is engaged in other than IGM.

Michael J. Redlick is a Residential Appraiser and currently performs residential appraisals. This activity is not a conflict of interest to the investment advisor activities.

Item 5. Additional Compensation

There are no arrangements in which someone other than a client gives the advisor an economic benefit for providing advisory services.

Item 6. Supervision

Michael J. Redlick and Andrew Redlick are Co-Owners and the only employees of Investment Growth Management, Inc.

Andrew J. Redlick, CFP® Co-President, Investment Manager & Financial Planner

BUSINESS EXPERIENCE

2022 to present **Investment Growth Management, Inc.**
Co- President
Investment Manager & Financial Planner

2014 to 2022 **Investment Growth Management**
VP, Operations
Associate Investment Manager
Investment Adviser Representative

EDUCATION

2013 Bachelor of Science degree,
Business Administration.
concentration – Finance
minor- Economics
Sonoma State University

2011 Associate of Arts degree.
Diablo Valley College

Item 3. Disciplinary Information

Andrew has no legal or disciplinary events to report

Item 4. Other Business Activities

There are no other investment related businesses that the advisor is engaged in other than IGM.

Item 5. Additional Compensation

There are no arrangements in which someone other than a client gives the advisor an economic benefit for providing advisory services.

Item 6. Supervision

Michael J. Redlick and Andrew Redlick are Co-Owners and the only employees of Investment Growth Management, Inc.

