eQRP°

NEW 2023 Secure Act 2.0 Changes

How to Legally Control Your IRA and 401(k) Investments in REAL Assets

US Tax Court Rules Checkbook IRAS ILLECAL

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By Damion S. Lupo

NEW 2023 Secure Act 2.0 Changes

- 14 states have already mandated 401ks for small business owners with as few as 5 employees, more states are being added, the eQRP plans satisfy this requirement.
- Up to \$90,000 in Tax Credits for business owners setting up Safe Harbor eQRP 401ks.
- Employer match AND Profit Sharing PAID for by IRS up to \$1,000 per employee, per year.
- 100% of 401(k) contributions can now be Roth (employer contributions too!).
- NO MORE Required Minimum Distributions on Roth 401(k)'s previously only Roth IRA's were exempt from RMD's.
- eQRP System Allows over \$700,000 of annual contribution (tax deduction) per family.
- Account Executive one point of contact, no more 800 number with crazy hold times.

Urgent News: Checkbook IRAs Illegal

The US Tax Court has ruled that Checkbook IRAs are ILLEGAL. In the November 2021 ruling, the judge ruled that an "IRA owner having constructive or actual receipt of IRA assets" is a distribution of assets.

Even though "A self-directed IRA is permitted to invest in a single-member LLC. Swanson v. Commissioner, 106 T.C. 76 (1996)...IRA owners cannot have unfettered command over the IRA assets without tax consequences."

Control over the direction of the assets by the owner is fine and legally allowed per Swanson but having command over the assets was ruled illegal and against the spirit and substance of Section 408m.

"A qualified custodian or trustee is required to be responsible for the management and disposition of property held in a self-directed IRA." Sec. 1.408-2(e), Income Tax Regs.

"Personal control over the IRA assets by the IRA owner is against the very nature of an IRA," said the judge.

Further, "independent oversight by a third-party fiduciary to track and monitor investment activities is one of the key aspects of the law." [section 408m IRA law]

On November 18, 2021 the US Tax Court ruled that Checkbook IRAs are now ILLEGAL.

This completely disrupts the self-directed IRA. THE eQRP IS NOT AFFECTED.

If you have an IRA with an LLC inside and you're using it to take possession of precious metals OR investing in syndications or other real estate deals, the court's ruling means your IRA is considered distributed.

To fix this problem please reach out to the eQRP team immediately.



For a more extensive summary and the full court's opinion please visit eqrp.com/mcnalty

The eQRP Unlocks Financial Freedom and Security for Your Retirement

You've worked hard to build your business and lifestyle, doing things your way. But traditional retirement plans don't yield the financial security you expected. Most plans don't allow instant access to the money you worked so hard for, and they offer only limited investment options. You want more - more control of your future and your retirement.

The eQRP[®] plan frees up those retirement funds so you can invest in what you choose, rather than giving that control to someone else.

2020 showed us in full force how unpredictable life can be. Long gone are the days that you can rely on your 401(k) for a comfortable retirement. Living the life you imagine is still possible, but you need to make choices today to shape it.

Once you realize what the eQRP can do for you financially, you'll wish you would have known about it before your very first investment. It can save you from giving up 37% of your profits to taxation, set up your heirs for financial security, and expand your portfolio to include real estate, real gold, real silver, and cryptocurrency.

In this special report, I will share my accumulated knowledge about the eQRP as an alternative investment strategy that YOU control. Putting you back in the driver's seat to transform your financial future.

Read on to learn more about the eQRP; what it is and how you can qualify to open one; the advantages of using this awesome retirement savings plan tool; a comparison with other investment tools; what qualifies; and what is prohibited. The goal is to provide you with a basic understanding and education about how the eQRP

may be of value in your overall retirement planning.

Let's dive in and see how the eQRP can help you break the shackles of financial bondage and give you the retirement lifestyle you dreamed of.

> "You won't get rich with an IRA; you'll just get old."



Damion Lupo eQRP Founder

Traditional Plan: Investing Myth and Mystery

We've been told stocks are the investment vehicles of choice, and you're better off investing for the long-term and leaving the money management to the professionals. It's so complex in fact, that it requires fund managers, account managers, stock experts, and analysts. This is the theory that they'd like us all to buy into. Wall Street "experts" tell us we need a diverse portfolio with a variety of stock investments to yield the best return. Sound familiar? If it is, you're one of 53 million households in the U.S. who are invested in the traditional investment market.

Like you, these hardworking people have been convinced that this is the path to a secure financial future and the ability to retire comfortably. After years of research and personal experience, I can tell you with confidence that this traditional path is a myth. A myth perpetuated by an industry that controls over \$40 trillion in assets - 89% of which are owned by households just like yours. They have created so much mystery on how they manage this huge pool of money that you ultimately have no control over the actual performance of your own investments.

"The eQRP is the real estate investor's secret weapon for tapping into the \$40 trillion sitting in retirement accounts."



Robert Helms Co-host of The Real Estate Guys™ Radio Show

The Truth:

- Investing all or most of your money in stocks, even a variety of stocks, is narrowly focused on one asset class: paper. Further, you have no control over the actual performance of your investments.
- Third-party custodians have long dominated the investment industry and charge large transaction fees (AUM a percentage fee for Assets Under Management) and limit your investment choices.
- As the trustees of these retirement plans, they make money charging transactional and management fees to perform trustee duties. Are you ready to say goodbye to the Wall Street machine and start taking control of your investments?

"I was paying enormous fees for my 401(k), and then I switched to an eQRP. I no longer pay thousands every year just to have someone babysit my money! I only wish I'd known about the eQRP a decade ago."



Dr. Tom Burns Orthopedic Surgeon, Syndicator & Author of 'Why Doctors Don't Get Rich'



Better Plan: The eQRP®

The great news is that there is an alternative to all this myth and mystery: the Enhanced Qualified Retirement Plan or eQRP. The eQRP is an alternative investment strategy that YOU control. Putting you back in control to transform your own financial future.

> "I love the eQRP for Real Asset Investors. Our investors get checkbook access to their money, avoid UBIT tax and never miss out on great deals."



Dave Zook Investment and Tax Strategist

















Bonds



Cryptocurrency



Top 11 Ways the eQRP Unlocks Your Financial Freedom

- **#1: NO UBIT with Leveraged Real Estate**
- #2: Fewer Plan Restrictions Mean More Freedom
- #3: Contribute 10X more than with an IRA
- #4: Lots of Investment Options Legally control your IRA and 401(k) money with REAL assets
- **#5: Flexibility to Adjust Your Contributions life happens**
- #6: Borrow Your Money Anytime
- **#7: Total Checkbook Control**
- #8: One, Consolidated Account
- **#9:** No Taxes for Generations Pass tax-free money to heirs
- **#10:** Tax Free Gains of 20, 30, 50% or more for Roth investment in Real Estate
- #11: RETRO Tax Planning: Start an eQRP this year and contribute up to \$61K to deduct from last year's income

NO 37% UBIT Tax with Leveraged Real Estate Keep your profit with leveraged real estate.

Did you know the IRS will tax you if you use your IRA for your real estate investment and there's debt involved?

Yeah, it's a sneaky tax called UBIT (Unrelated Business Income Tax) that gets triggered by any debt in an investment your IRA makes. Since IRAs are governed under section 408 they are not exempt and are subject to this tax, which is up to 37% on all the gains you make from the leverage. **C** Thanks for saving my dad \$200K in UBIT taxes when we moved his IRA assets into the eQRP."

- Travis Godon

Whoa! Didn't know that? Guess what, there's good news!

The eQRP is exempt from the UDFI! (Unrelated Debt Financed Income.) It conforms to IRS rules under Section 401 which means the eQRP is exempt from the UBIT tax triggered by UDFI! #gamechanger

What if you already have leveraged real estate in your Self-Directed IRA?

All you have to do is rollover your IRA money and investments into an eQRP and presto, no more tax. You must do this before you sell the assets! Yes, you can actually transfer ownership of those assets from your self-directed IRA into the eQRP. It's called an inkind rollover. No tax, no penalty, no UBIT slap!

> Fewer Plan Restrictions Mean More Freedom

The eQRP is the Ferrari of retirement plans because of the way it's written – with far fewer restrictions when compared to 401(k)s and even Solo 401(k)s.

For example, Solo(k)s don't allow employees. An eQRP allows them! Most 401(k) plans already have limits written into them. They restrict what you can and can't do, what you can invest in, and when you can access your money.

With an eQRP, YOU have total control over:

- What you invest in from real estate, real physical gold and silver, tax liens, business startups, foreign real estate, LLC, joint ventures, private loans, and many more.
- The performance of your investment.
- Asset allocation.

Plus, since you're managing your money, no more advisor fees chewing up the returns and principal from your account year after year regardless of performance. The eQRP is written to give you every investment option legally allowed. You can do anything you want within the framework of the law.

You also eliminate transactional and management fees that add up to more than 60% of your profits.

- According to Jack Bogle, Founder of Vanguard (in regard to a QRP[®])

B Contribute 10X more than with an IRA

As you may know, an IRA (Individual Retirement Account) allows you to contribute \$6,000 per year, or \$7,000 if you're over age 50.

The problem with this is that over the next 20 years you're only going to be able to get approximately \$100,000 into your retirement plan. That's just not enough to get close to what you'll need for retirement. It might be a good chunk to live on for a year but it won't last for decades.

Considering people are living longer than ever, and with new life-extension medical technologies on the horizon, you will need more than an IRA.



In addition, with an eQRP, you can contribute \$61,000 per person, up to \$122,000 with your spouse max and even more if you're over 50. (An extra \$6,500 per person over age 50 per year can be contributed – this is the catch-up bump.)

That's more than \$1 million in contributions over the same 20 years and more than \$2 million with a spouse. Literally 10X more!

Use the eQRP to build your wealth faster so you can invest more and have the retirement you want.

Lots of Investment Options

There are literally millions of things that you can invest in with an eQRP, including real gold and silver you can legally take possession of.

Investment options

- Syndications
- Real Estate (anywhere in the world)
- Apartments, Multiplexes and Houses
- U.S. Gold and Silver Bullion Coins
- .995 Pure Gold and .999 Pure Silver Bars
- Small Business Startups, LLCs
- Trust Deeds and Mortgage Notes
- Single Family and Multi Unit Homes
- Securities

- Cryptocurrency
- Stocks, Bonds, Mutual Funds
- Co-Ops
- Commercial Property
- Improved or Unimproved Land
- Commodities and Futures
- CDs
- Contracts of Sale
- Leases
- And many more!



Physical Possession of Gold & Silver

Many people would love to have physical gold and silver in hand, but until now, there's not been a way to buy metal and take possession of it (legally) with retirement money. With an eQRP, you're allowed to take physical possession of the metals. Total privacy. Total control. Anyone who says you can do this with a Self-Directed IRA should be corrected. The IRS says this is disallowed and can result in penalties up to 100% or more of your investment. That's a penalty you'll want to avoid!



Investing in Crypto with a 401(k)

Thanks to the advent of cryptocurrencies and blockchain technology, your retirement fund investment options have expanded beyond stocks, bonds, and mutual funds. Since the 401(k) plan's inception in the late 1970s and manifestation in 1980, it has made a huge impact on how Americans save for their retirement. But cryptocurrencies have the potential to drastically change your 401(k)'s performance. Not only can you contribute more to an eQRP than to traditional 401(k)s but you can take advantage of the flexible investment options and potential higher earnings. Bitcoin's value alone went from \$10K to almost \$70K in about a year — that's a 600% increase!

Unfortunately, traditional IRAs and 401(k)s are too rigid for cryptocurrency investment. That's because they do not offer the ability to invest in different kinds of assets, such as cryptocurrencies. Instead, an eQRP provides an ideal solution where you can benefit from flexible investment options to use cryptocurrency for retirement planning.

Gain Flexible Investment Options with eQRP Checkbook Control

With checkbook control, it's easy and quick to invest in cryptocurrency with your eQRP. When you're using an eQRP, you're able to invest in cryptocurrencies, such as bitcoin and Ethereum, within your retirement plan. This helps to simplify what investments you can choose to be a part of your plan with you as the custodian. An eQRP checkbook enhances that simplicity by making it easy to enroll and invest.

Easy to Invest in Cryptocurrency:

- Set up your eQRP with eQRP.
- Establish your eQRP checking account at the bank of your choice.
- Once your account is funded, open a crypto wallet solely for use with retirement funds.

If you want to invest in more than a few hundred or thousand a week, you can verify your ID with your eQRP wallet provider to increase your limits. Some eQRP wallets will also allow you to increase your investment limits by investing more after verification.

One of the best reasons for using a trusted eQRP is that you can leverage the security and protection it offers to keep your information private and your data secure. You can also take your security to the next level by opting for a physical wallet that comes with a password. This makes it easy for you to travel without having to go into your digital wallet on your mobile device.

Flexibility to Adjust Your Contributions



With an eQRP, your contributions to the plan are totally up to you. If business is slow and you need to reduce your personal contributions, you can slow down. If business is going great, you can max out.

You're protected from economic downturns or anything else that would make it difficult or impossible to contribute.

This flexibility is one of the reasons the eQRP is so much better than other tools. For example, with cash-value life insurance, you must contribute every year or face your principal being eaten up by fees and policy costs. Not so with an eQRP. It's totally flexible to fit your life.



Your eQRP is like a private bank line of credit. It is always available to you. At any time, you can write yourself a check and have cash immediately.

Need \$50K in 5 minutes? You can borrow up to \$50K or half of your plan assets, or whichever is less.

Back in 2008 the banks froze almost all real estate investors' credit cards because they wanted to reduce their risk. Even successful investors got frozen. I had AMEX freeze my black card that was in good standing – it happened while I was trying to buy a pallet of toilet paper at Costco. Card DECLINED. What?

So what happens when you need cash for something and banks aren't your friend?

Use your built-in \$50K line of credit. Once you rollover your retirement money into your eQRP you'll simply write yourself a check for up to \$50K or 50% of your account. Takes seconds and you're always approved.

This can be a life-saving option when you need money or just want to use your own assets to fund things so instead of paying interest to the BANK, pay interest to YOURSELF!

The loan must be amortized over a period of no more than five years (except for loans that are used to buy your personal residence). You must also charge a reasonable rate of interest. Payments must be made at least every quarter in substantially equal amounts.

You can always make more frequent payments, such as monthly or weekly. It is important to remember that loan repayments are NOT plan contributions. A neat side effect of the interest you're paying to the plan, is that money will increase your account balance even more!

All eQRPs come with the credit line built in!

Total Checkbook Control — Superspeed

The eQRP allows you, the owner, to choose any person you'd like to be the trustee, including yourself. Since the trustee is responsible for funding the investments, you suddenly find yourself in total and complete control.

As trustee of the plan, you no longer have to get approval for each and every investment you'd like to make. No more outside custodian or trustee hovering over you (unless you want one).

When you want to invest in an eligible investment, write a check or send a wire.

This control means all assets of your eQRP are under your sole authority, direction and discretion.

It also means you eliminate the expense and delays associated with a custodian, a common problem with most Self-Directed IRAs.

This enables you to act quickly when the right investment opportunity presents itself. Timing is everything.

When speed matters, you'll be glad you have the eQRP ready to execute and tie up those great deals.



It can be incredibly time-consuming to manage all the different 401(k) and IRAs that many people have floating around and there's not a lot of power having money spread out.

With your eQRP, you can rollover any and all investment money from your 401(k), 403b, 457, IRA and SEPs. You're allowed to transfer those funds and assets into your eQRP tax-free and penalty free.

You can roll over as many accounts as you'd like and consolidate them into your eQRP.

Consolidating all these funds will save you money and time managing the funds. One account.



The current tax code allows any owner of an eQRP to leave their accounts to an heir who can decide to take distributions of the money over 10 years. This is true for deferred and ROTH accounts. Let's say you set up a ROTH account today, grow it for the next 40 years, and then leave it to someone who happens to be 25-years-old when you pass away. That person doesn't pay any taxes on the account, the gains, or the distributions. (Assuming the account balance is less than the current estate tax exemption, which is over \$11,000,000 in 2022.)

The heir gets to grow the account, spend the money and do so for 10 years, with zero tax.

You've now got the power to opt out of the tax system for generations. Your children and grandchildren will thank you.

Remember: Any Roth Conversions can IMMEDIATELY be taken out tax free and penalty free!

Tax-Free Gains of 20, 30, 50% or More for Roth investment in Real Estate

Your eQRP has a built-in ROTH option. This is a chunk of your retirement money (or all, if you want) that you pay taxes on before contributing the money. In this case, you pay the tax now and then pay zero tax on the growth and distributions forever.

Let's say you contribute \$10,000 to your eQRP and pay taxes on that money today. Wouldn't it be nice to have that \$10,000 grow by 10X and then 10X again and have it be worth a million dollars? Rest assured this will never happen in the stock market.

But, what if you invest in real estate and use leverage (debt)? What if you buy a property, use your \$10,000, and take out a mortgage for the rest of the purchase price?

Example: You buy a house for \$100,000 and use \$10,000 from your ROTH eQRP, then borrow the other \$90,000. You do some repairs and sell the house for \$200,000 a couple years later. You just made 1000%. Not 10%. Not 100%. But 1000% in two years!

Oh, and since you used the ROTH, all your gains are tax-free and it stays in the plan to continue growing.

Now, remember, if you had used a Self-Directed IRA to buy property and used a mortgage, you'll trigger UDFI. In the last example, you'd pay about **\$30,000** in taxes if you used your IRA.

When Can I Receive Distributions from My eQRP?

Distribution from the eQRP can be made when:

- You reach age 59 ½ or suffer financial hardship.
- You retire, die, become disabled or sever employment.
- The plan ends and no other plan is established or continued.

RETRO Tax Planning: Start an eQRP this year and deduct contributions from your previous year's income

Facing high taxes this year and still looking for write-offs?

Sign up for an eQRP and potentially reduce your tax bill by tens of thousands of dollars.

The IRS lets you set up an eQRP retroactively so you can contribute today and reduce taxes for the previous year. This may be the only thing in the IRS code you can do backward! Set up an eQRP before you file your return to lower those taxes and start getting all the benefits of having the Ferrari of 401(k)s.



Deadline: Before you file your previous year's tax return.

"I recommend our clients explore the opportunities provided by the eQRP. The quick and easy access to their retirement funds means that they never miss out on a deal and it offers ways to invest tax free permanently using the ROTH eQRP."



Tim Gertz, CPA Partner, Provision Wealth

Am I Eligible for an eQRP[®]?

The main qualification to have an eQRP is to have some type of self-employment activity, consulting, property management, or even a lemonade stand - pretty simple!

Even if you work for a company and get a W2, you can still qualify if you have side business activity of any type. For example, many people who are investing in real estate are qualified simply with their real estate activities.

If you have property you manage, talk to your CPA about paying yourself a management fee and, just like that, you have self-employment income!

You'll use this earned income to make contributions.

Have Employees?

The Safe Harbor eQRP is the only 401(k) plan in the nation that gives company owners and their employees true control over their retirement money - empowering them to invest in real assets like real estate, gold, Bitcoin and private placements.

If you have a business with any part-time or full-time employees, you are eligible for the Safe Harbor eQRP. That's the main qualification!

You'll use earned income to make contributions. This is income that you're paying self-employment taxes on: Social Security and Medicare. Passive income from rental property or interest is not eligible to be used as a contribution.

Want more info? Give us a call at 800-270-1649.



Jim Lala eQRP Client "My wife stays home and raises our daughter, and that's so huge. And that literally wouldn't be possible without the capital I raised through the eQRP."

Why haven't I heard of the eQRP[®]?

You probably haven't heard of the eQRP[®] (Enhanced Qualified Retirement Plan) because Wall Street doesn't want you to know about it! Enhanced Qualified Retirement Plans are not new. In fact, they've been around over 40 years as part of the Revenue Act of 1978, which cleared the way for defined contribution plans. At that point in our history, the responsibility shifted from employer-based pension plans to the individual.

The Employee Retirement Income Security Act of 1974 (ERISA) is a federal law that sets minimum standards for most voluntarily established pension and health plans in private industry to provide protection for individuals in these plans. ERISA does not protect Solo(k) plans.

The idea was revolutionary: employees would be able to contribute their own money in a tax-advantaged way to an account that would supplement any other benefits they had. All good so far, right? The challenge became when large financial institutions entered the picture and focused on employer-organized programs. These were called 401(k) programs and were meant to "simplify" the process for employees and help them manage their money. Over time, this has resulted in massive portfolios managed by fund managers that translates into big business for financial institutions. The truth: As of 2015, a survey found only 22% of employees were confident that they were on track for retirement, even though 84% contributed to their retirement plan.

Returning to the original statute, an eQRP doesn't actually need the third-party custodian or asset manager. You can be your own trustee. So, IRS Code (Section 401) defines the eQRP as a 'retirement savings trust.' It is essentially a retirement savings plan set up by a small business owner, someone with business activity.

Wait, you say: "What if I'm not a small business owner?" You can still qualify for an eQRP even if you do not own a small business. Don't worry! If you have an investment business, work for yourself or have part-time income or activity that could produce income, then you can have an eQRP. Being in control of your funds saves you from the risk of investment managers making decisions about your money that are profitable for them but may not be in your best interest.

Is Anything Prohibited?

The Internal Revenue Code does not describe what an eQRP can invest in, only what it cannot invest in. Prohibited transactions are listed in Code Section 49755 and are transactions between the plan and a disqualified person that are prohibited by law.

- Selling or buying an interest in real estate owned by the eQRP to a "Disqualified Person."
- Purchasing real estate with eQRP funds and leasing to a "Disqualified Person."
- Investing eQRP funds in a house that is used by the eQRP owner or other "Disqualified Person."
- Using personal funds to pay taxes and expenses related to the eQRP plan real estate investment.
- Being compensated for any services performed for or on behalf of the eQRP.
- Using your retirement funds to make a real estate investment and earning a commission personally from the purchase.
- Making an investment using your eQRP into a company or fund that will benefit the eQRP participant or a "Disqualified Person" personally.

Disqualified Person

- An employer of any of the participants in the plan.
- A 10% (or greater) partner in a partnership that has the plan.
- A fiduciary of the plan.
- A highly compensated partner (an employee who makes 10% or more of the employer's annual wages.)
- An employee organization with any participating members who are covered by the plan.
- Any related persons of the "Disqualified Person," some of whom include spouses and direct descendants.

The age-old idea of putting money into the stock markets and getting an 8-10% fixed reliable return without being savvy (i.e. "passive dumb income is a dead idea), those days are over." – Bill Gross, PIMCO

REAL COMPARISON	IRA	SDIRA	eQRP®
Control, Fees & Tax Credit			
UBIT - UDFI exempt	X	X	\checkmark
No custodian	X	X	\checkmark
Checkbook Control	X	X	\checkmark
Annual fees 2022	some	\$300-4000	\$895
AUM fees (Assets Under Mgmt)	\checkmark	\$300-4000+	zero
Legal Protection			
Covered by ERISA	X	X	\checkmark
Judgement protection	X	X	\checkmark
Bankruptcy protection	X	X	\checkmark
IRS Audit Protection	X	X	\checkmark
Contributions & Distributions			
Annual MAX contribution 2022	\$7,000	\$7,000	\$135,000
Catch up contributions over age 50	\$1,000	\$1,000	\$6,500
Unlimited income for Roth	X	X	\checkmark
Hardship distributions	\checkmark	\checkmark	
Mandatory distributions	\checkmark	\checkmark	\checkmark
Businesses with Employees			
Allows Employees	X	X	\checkmark
Investment Options			
Real Estate without UBIT	X	X	\checkmark
Public or Private Stocks/Bonds/Funds	X	\checkmark	
Crypto in hand	X	X	
Possess physical gold & silver	X	X	\checkmark
Ability to purchase life insurance	X	X	\checkmark
Borrowing Ability			
Borrowing up to \$50,000	X	X	\checkmark

Thank you for reading this guide and continuing your journey to being responsible for your financial future. We wish you all the best with your financial transformation!

This report is designed to provide general information pertaining to retirement accounts and investing. Laws and general practices vary from state to state and change constantly. Specific advice for specific situations should be obtained by the reader's own advisors. The author has taken reasonable precautions in preparing this book and believes the facts are accurate as of the date it was written. Many of the thoughts, ideas and opinions are subjective and relevant to the current environment. They could change based on any number of evolving environments, laws and geo political shifts. Neither the author nor publisher assumes any responsibility for any errors or omissions. The author and publisher specifically disclaim any liability resulting from the use or application of the information contained in this book, and the information is not intended to serve as legal advice related to individual situations.

The author highly recommends you consult with your advisors, including your attorney and accountant, about any plans you may have or are considering and that you get their professional opinion and advice before taking any action.

- 1. ICI.org (2015)
- 2. GPO.gov

3. Financial Finesse 2015 Year in Review research on employee financial trends

4. https://www.dol.gov/general/topic/health-plans/erisa

5. https://www.irafinancialgroup.com/wp/internal-revenue-code-section-4975-impactonthe-self- directed-ira/

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