

**Part 2A of Form ADV: *Firm Brochure***

**Pension Parameters Financial Services, Inc.**

28 West 44th Street  
16th Floor  
New York, NY 10036

Telephone: 212-675-9360  
Email: [p.d.b401e@gmail.com](mailto:p.d.b401e@gmail.com)  
Web Address: [pensionfinancialservices.com](http://pensionfinancialservices.com)

03/18/2014

This brochure provides information about the qualifications and business practices of Pension Parameters Financial Services, Inc.. If you have any questions about the contents of this brochure, please contact us at 212-675-9360 or [p.d.b401e@gmail.com](mailto:p.d.b401e@gmail.com). 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 Pension Parameters Financial Services, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 110405.

## **Item 2    Material Changes**

This Firm Brochure, dated **03/18/2014**, provides you with a summary of Pension Parameters Financial Services, Inc.'s investment management services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

1. Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of **December 31**. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.
2. Material Changes: Should a material change in our operations occur, depending on its nature we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our investment management services or investment management affiliates – any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

The following summarizes new or revised disclosures based on information previously provided in our Firm Brochure dated **03/20/2013**;

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

## **Item 4 Investment Management Business**

Pension Parameters Financial Services, Inc. is an SEC-registered investment manager with its principal place of business located in New York. Pension Parameters Financial Services, Inc. began conducting business in 1991.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Kevin Mc Cormack, President

Pension Parameters Financial Services, Inc. offers the following investment management services to our clients:

### **PENSION CONSULTING SERVICES**

We provide several investment management services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Pension Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

#### *Investment Policy Statement Preparation (hereinafter referred to as "IPS"):*

We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

#### *Selection of Investment Vehicles:*

We offer guidance and recommendations to the client in the choice and retention of investment options. Through the institutional trading platform that we use, we offer no load and no transaction fee mutual funds (both index and managed).

#### *Monitoring of Investment Performance:*

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

#### *Employee Communications:*

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we also provide annual educational support and opportunities to discuss mutual fund investment choices. The nature



of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The educational support and opportunities to discuss mutual fund investment choices provide plan participants with asset allocation recommendations.

### **AMOUNT OF MANAGED ASSETS**

As of 12/31/2013, we were actively managing \$58,294,000 of clients' assets on a non-discretionary basis.

## **Item 5 Fees and Compensation**

### **RECORD KEEPING AND ASSET MANAGEMENT FEES**

Our fees for Record Keeping and Asset Management Services are usually directly debited from the clients' accounts, and are based on a percentage of assets under management, according to the following schedule:

Tiered schedule ranging from .35% to 1% of Net Asset Value ("NAV")

### **GENERAL INFORMATION**

***Termination of the Investment Management Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of **30** days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

***Mutual Fund Fees:*** All fees paid to Pension Parameters Financial Services, Inc. for investment management services are separate and distinct from the fees and expenses charged by mutual funds and/or Exchange Traded Funds ("ETFs") to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the management consultant services being provided.

***Additional Fees and Expenses:*** In addition to our investment management fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

***ERISA Accounts:*** Pension Parameters Financial Services, Inc. is not deemed to be a fiduciary to investment management clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income Security Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and

the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Pension Parameters Financial Services, Inc. may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Pension Parameters Financial Services, Inc.'s investment management fees.

**Advisory Fees in General:** Clients should note that similar investment management services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit prepayment of fees.

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

Pension Parameters Financial Services, Inc. does not charge performance-based fees.

## **Item 7 Types of Clients**

Pension Parameters Financial Services, Inc. provides investment management services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)

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

### **METHODS OF ANALYSIS**

We use the following methods of analysis in formulating our investment management service and/or managing client assets:

**Fundamental Analysis.** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Qualitative Analysis.** We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

**Asset Allocation.** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Mutual Fund Analysis.** We look at the experience and track record of the manager of the mutual fund in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund, which could make the holding(s) less suitable for the client's portfolio.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **Item 9    Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our investment management business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

## **Item 10    Other Financial Industry Activities and Affiliations**

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Pension Parameters Financial Services, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Pension Parameters Financial Services, Inc.'s Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

## **Item 12 Brokerage Practices**

Pension Parameters Financial Services, Inc. has an arrangement with Matrix Settlement & Clearance Services, LLC ("MSCS") and Sunguard Trading ("SGN Trading"), which handles trades for Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which MSCS and Fidelity provide our firm with their "platform" services. The platform services include, among others, brokerage, custodial, and other related services. SGN Trading assist us in managing and administrative support, record keeping and related clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, record keeping and client reporting.

Fidelity also offers other services intended to help our firm manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Pension Parameters Financial Services, Inc. may contract directly.

Pension Parameters Financial Services, Inc. is independently operated and owned and is not affiliated with Fidelity.

Fidelity provides access to many no-load mutual funds without transaction charges.

## **Item 13 Review of Accounts**

### **RETIREMENT PLAN CONSULTING SERVICES**

**REVIEWS:** Pension Parameters Financial Services, Inc. will review the client's Investment

Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. Pension Parameters Financial Services, Inc. will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur annually.

These accounts are reviewed monthly by a committee consisting of: Kevin Mc Cormack, President, Marjorie Mantas, Certified Financial Planner and Vice President for Investments, Amelia Soto, Vice President and Pauline Dana-Bashian, Attorney and Chief Compliance Officer.

**REPORTS:** Pension Parameters Financial Services, Inc. will provide reports to Retirement Plan Consulting Services clients based on the terms set forth in the client's Investment Policy Statement (IPS).

## **Item 14 Client Referrals and Other Compensation**

It is Pension Parameters Financial Services, Inc.'s policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Pension Parameters Financial Services, Inc.'s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the investment management services we provide to our clients.

## **Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Our firm does not have actual or constructive custody of client accounts.

## **Item 16 Investment Discretion**

As previously disclosed in Item 4 of this brochure, our firm does not provide discretionary asset management services; we manage client assets only on a non-discretionary basis. Therefore, we will obtain the client's approval before executing transactions in the client's

account.

## **Item 17 Voting Client Securities**

We do not offer any consulting assistance regarding proxy issues to clients.

## **Item 18 Financial Information**

As an investment management firm that ***does not maintain discretionary authority for client accounts***, we are nevertheless required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Pension Parameters Financial Services, Inc. has no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Pension Parameters Financial Services, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.