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March 31, 2014

This “Brochure” provides information about the qualifications and business practices of InterServ, LLC [“InterServ”]. If you have any questions about the contents of this Brochure, please contact us at 251-662-2516. 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.

InterServ, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any particular level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about InterServ, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

Additional information about InterServ, LLC is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with InterServ, LLC who are registered, or are required to be registered, as investment adviser representatives of InterServ, LLC.

As of March 2014, InterServ made the following Material Change to CB MAPs Service:

CB MAPs – Liability Driven Investment Management for Cash Balance Plans

For CB MAPs utilizing the MidAtlantic Trust Company Custodial Platform there is a 50 bps fee charged on all assets (minimum of \$3,000). For CB MAPs utilizing other Platforms, there is a 50 bps fee charged on all assets (minimum of \$5,000).

### Other:

On March 7, 2014, Verisight, Inc. headquartered in Walnut Creek, CA purchased a 100% interest in InterServ LLC’s parent company (DailyAccess Corporation). This stock purchase should not result in any significant changes in the day-to-day operations of InterServ, LLC. InterServ, LLC will continue to operate as it did prior to the purchase and provide the same levels of services to its clients.

As clarification from our previous update, the schedule below is to be used with 3(38) Custom KMAPs.

### **3(21) Investment Support Services**

<b>Plan Assets</b>	<b>Asset-Based Fee</b>
First \$1 Million	0.10%
Next \$4 Million	0.05%
Assets over \$5 Million	0.00%

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ADV Part 2B Supplemental Brochure

## **Item 4 – Advisory Business**

InterServ, LLC (“InterServ”) provides a variety of services to retirement plan sponsors and plan investment advisors. Services include investment performance analytics as they pertain to open-ended mutual funds, collectives & ETFs and sometimes collectively referred to as (“fund(s)”); assist with the review of Investment Policy Statement (IPS) for those plans; as well as asset allocations for model portfolios for use as plan investment options. InterServ has been in business since April 2006 and is a wholly-owned subsidiary of DailyAccess Corporation.

### **3(21) Investment Support and Fiduciary Services:**

Under this service InterServ will conduct the following activities for defined contribution plans:

- Sign on as an ERISA Section 3(21) fiduciary
- Review and Consulting Assistance on the Investment Policy Statement
- Analysis and Consulting regarding Current Investment Menu Options
- Screening for “Appropriate” Investment Options
- Develop a Recommended Investment Menu
- Monitoring Investments on an Ongoing Basis

### **3(21) Investment Menu Audit Services:**

Under this service InterServ will conduct the following activities for defined contribution plans:

- Conduct an initial evaluation audit of current menu options
- Develop a screened list of “appropriate” investment menu options
- Sign on as an ERISA Section 3(21) fiduciary
- Provide Quarterly Monitoring Reports
- Provide a screened list of “appropriate” investment menu options

### **3(38) Managed Asset Program**

Clients may also choose to utilize InterServ’s 3(38) Managed Asset Program (MAPs).

- K MAPs – Customized or Standard Target Date and Risk Based Portfolios for Defined Contribution Plans
- DB MAPs – Liability Driven Investment Management for Defined Benefit Plans
- CB MAPs – Actuarial Driven Investment Management for Cash Balance Plans

Under the MAPs Service option, InterServ will:

- Contract as an ERISA Section 3(38) investment fiduciary on the MAPs
- Develop and administer MAPs that incorporate both risk tolerance and expected date of retirement elements
- Readjust the allocations in the MAPs if needed and rebalance to maintain the intended investment objectives

## Item 5 – Fees and Compensation

InterServ's 3(21) Investment Support and Fiduciary Services to defined contribution plans is as follows (note: there is a \$2,000 base fee plus an asset based fee for this service):

Plan Assets*	Asset-Based Fee
First \$10 Million	0.10%
\$10,000,001 - \$25 Million	0.05%
Assets over \$25 Million	Custom

\*net of Participant Loans and Self Directed Accounts (SDAs)

InterServ's 3(21) Investment Menu Audit fee schedule for defined contribution plans is as follows:

Plan Assets*	Annual Fee (paid Quarterly)
First \$2 Million	\$2,000 (\$500/Qtr)
\$2,000,001 - \$5 Million	\$3,000 (\$750/Qtr)
\$5,000,001 - \$ 10 Million	\$4,500 (\$1,125/Qtr)
Assets over \$10 Million	Custom

\*net of Participant Loans and Self Directed Accounts (SDAs)

### 3(38) Managed Asset Program

The fee for InterServ's Standard Target Date and Risk Based K MAPs is an annual fee of 0.30%:

Fees for Custom InterServ's K MAPs<sup>1</sup> – Standard Target Date and Risk Based Portfolios for Defined Contribution Plans:

#### **3(21) Investment Support Services**

Plan Assets	Asset-Based Fee
First \$1 Million	0.10%
Next \$4 Million	0.05%
Assets over \$5 Million	0.00%

#### **3(38) Custom KMAPs**

Assets in MAPs	Asset-Based Fee
First \$1 Million	0.40%
Next \$4 Million	0.25%
Assets over \$5 Million	0.20%

<sup>1</sup>Some degree of 3(21) Fiduciary Services required with 3(38) Custom K MAPs (\$5,000 Minimum for the engagement)

Fees for InterServ's DB MAPs are charged to defined benefit plan participants based on the assets in the portfolios. The following fee schedule is for DB MAPs that are customized for defined benefit plans (Note there is \$5,000 minimum for this Service):

Assets in MAPs	Asset-Based Fee
First \$5,000,000	0.40%
Assets over \$5 Million	Custom

For CB MAPs utilizing the MidAtlantic Trust Company Custodial Platform there is a 50 bps fee charged on all assets (minimum of \$3,000). For CB MAPs utilizing other custodial platforms, there is a 50 bps fee charged on all plan assets (minimum of \$5,000).

InterServ's fees for Fiduciary services are generally invoiced quarterly, in arrears, based on the market value of the plan assets under advisement as of the last business day of the previous quarter. InterServ Clients can choose one of three payment options for InterServ fees which includes: 1) direct payment from the plan sponsor; 2) deducting InterServ's fees from plan assets; or 3) deducting from a Revenue Holding Account (if available). InterServ requires plan sponsor written authorization to withdraw fees from plan assets or a Revenue Holding Account.

Fees are typically prorated based on the number of days an Account receives InterServ's services under a new Service Agreement or when InterServ receives notice of termination during a calendar quarter. Additional charges, if any, that are imposed by third parties are the sole responsibility of the investment advisor.

InterServ Service Agreements may be terminated by either party without penalty upon a minimum of thirty (30) days written notice (unless such minimum notice requirement is waived in writing by the party receiving such notice). However, any fees due to InterServ for services provided prior to date of termination will be payable upon receipt of invoice.

#### **Item 6 – Performance-Based Fees**

InterServ does not charge performance based fees.

#### **Item 7 – Types of Clients**

InterServ's client base consists of retirement plan sponsors, foundations, endowments, and plan investment advisors.

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

InterServ employs a proprietary scoring methodology called the "InterScore" to provide relative evaluations of plan investment options. The InterScore scoring process compares various funds to their peers through a number of measures based on Modern Portfolio Theory (MPT) and is designed to identify investment managers that have an established history of adding value through their management process. Sources of information used in the scoring process may include services that compile and make available various types of fund and/or portfolio manager data, in addition to computer software to assist in the calculations.

The InterScore methodology narrows the universe of potential funds to a group of five (5) or fewer funds. Each fund is then analyzed in greater detail using qualitative measures such as interviews with the fund company staff, as well as additional detailed analyses to find the best fit for the specific plan requirements, based on the following guidelines:

- Style Analysis: Are the fund's style characteristics near the mean of the peer group? In other words, is the fund relatively pure in its style exposure?
- Fit with plan: Does the fund's style characteristics overlap with other funds in the plan? Is the expense ratio in line with that desired by the plan?
- Manager history: Does the manager have a long history of outperforming peer funds?

- **Management Structure:** What is the fund management structure? Are there concerns with this structure?
- **Fund Family & Regulatory Issues:** What is the history of the fund and the fund family? Are there any current or historical compliance/regulatory issues?
- **Manager Commentary:** What are the fund manager's thoughts on the financial markets and the fund's performance? Is it acceptable?
- **Risk Management:** How does the fund control measure, prevent and control risk? Are the fund's risk management practices acceptable?

### **Asset Allocation:**

InterServ's asset allocation methodologies are constructed in accordance with Modern Portfolio Theory (MPT) and the Efficient Frontier concept. InterServ utilizes various software and models to aid in the determination of the efficient frontier, which is defined as a combination of investments that offers the best possible expected return for a given risk level.

Specific to a traditional Defined Benefit retirement plan, InterServ's investment methodology attempts to reduce interest rate risk by investing in assets that have a similar risk profile as the plan's expected liabilities, also known as "Liability-Driven Investing." For a Cash Balance Plan, InterServ's investment methodology attempts to achieve the plan's established investment target.

As previously noted, InterServ may include the availability of 12b-1 fees in its Fund selection criteria for a given plan or model, the purpose of which is to compensate one or more plan investment advisors for providing educational and/or other support services to the plan and/or the plan participants. Fund share classes that offer 12b-1 fees may be more expensive than similar share classes that do not have 12b-1 fees.

In addition to mutual funds, InterServ may also provide investment advice related to other pooled investment vehicles, including foreign mutual funds, collective funds and exchange traded funds (ETFs).

### **Risks and Other Limitations**

Investing in mutual funds and other investments involves risk, including the risk of a loss of principal investments. There is no guarantee that InterServ's investment methodology will result in a positive investment return for any client portfolio.

Previously mentioned references to Modern Portfolio Theory and Efficient Frontier concepts should not be construed as any guarantee of efficiency in expected returns as compared to portfolio risks. InterServ applies a variety of criteria in choosing funds for each asset class, including historical returns, fee ratios, management tenure and other criteria, the application of which may cause a recommended portfolio to be theoretically less efficient than it might have been had other fund criteria been utilized. InterServ's ability to match funds to asset classes for any given plan may be limited due to limitations in the number and/or types of funds offered in any particular plan.

Please note that that Managed Account recommendations provided by InterServ do not take into account investments and other assets held outside of the plans for which InterServ provides services. Plan sponsors, with fund and/or individual security investments outside of the retirement plan, foundation or endowment for which InterServ is providing advice, should speak to a qualified investment advisor prior to implementing any allocation recommendations provided by InterServ. Additionally, because InterServ is reliant upon third-parties to provide updated plan information, recommendations made by InterServ may

not always capture or include changes to a roster of funds offered in a given plan if those changes were not communicated to InterServ.

### **Item 9 – Disciplinary Information**

InterServ has no disciplinary information to report.

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

Certain principals and officers also serve in a similar capacity for DailyAccess Corporation. InterServ, LLC is a wholly-owned subsidiary of DailyAccess Corporation, a firm which provides recordkeeping, administration, and consulting services to employee benefit plans. DailyAccess is also the owner of DailyAccess Health and Welfare Services, LLC a wholly-owned group benefits insurance insurance brokerage company.

DailyAccess Corporation is wholly-owned by Verisight Inc. which also provides recordkeeping, administration, and consulting services to employee benefit plans. Verisight also owns Verisight Trust Company, a New Hampshire-chartered limited-powers trust company.

### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions**

InterServ's officers, directors and employees may from time to time purchase or sell, or hold positions for their personal accounts, in securities that may also be or have been or will be recommended by the InterServ to its clients.

#### **Code of Ethics**

InterServ has adopted a Code of Ethics ("Code") which includes an Insider Trading Policy to establish principles of conduct and to detect and avoid conflicts of interests that may arise between employees and clients as a result of personal investing activities. The Code is designed to ensure, among other things, that employees conduct their investing activities in accordance with applicable law and in a manner where clients' interests are placed first and foremost. InterServ's Code applies to all employees of InterServ and any account in which an employee has control or a beneficial interest as well as the accounts of family members of each employee's immediate household, as further described in the Code.

The Code requires employees to report all accounts and securities holdings covered by the Code at the commencement of their employment and annually thereafter. In addition, on a quarterly basis, all employees are required to report all securities transactions executed during the quarter. Additionally, the Code requires all employees to pre-clear transactions in initial public offerings and private placements.

Certain securities are exempt from the requirements of the Code including open-end mutual funds which are neither managed nor affiliated with InterServ, money market funds, money market instruments, unit investment trusts that are invested in open-end mutual funds and U.S. Government securities.

A copy of InterServ's Code of Ethics can be provided to any current or prospective client upon request.

#### **Insider Trading Policy**

In addition to its Code of Ethics, InterServ has established an Insider Trading Policy. InterServ's Insider Trading Policy includes specific requirements regarding the possession of material non-public information ("MNI") in order to avoid situations that may violate applicable statutes or regulations or create an appearance of impropriety. InterServ's Insider Trading Policy strictly forbids any employee from (i) conducting trades, either personally or on behalf of others, including clients of InterServ, while in possession of MNI; or (ii) communicating MNI to others.



## **Item 12 – Brokerage Practices**

InterServ, LLC does not recommend brokers to their clients.

## **Item 13 – Review of Accounts**

The InterServ reviewer of client accounts is the Director of Investments. InterServ's clients are primarily retirement plans, foundations, and endowments that engage InterServ to, among other things, perform analytical evaluations of the performance of plan investment options. InterServ surveys funds on a monthly basis and provides quarterly and annual reviews for plan sponsors and plan investment advisors.

InterServ provides plan sponsor and endowment clients with a quarterly investment review that evaluates each plan investment options' performance. Depending on the performance of each investment option and based upon the Plan's Investment Policy Statement (IPS), InterServ determines if a current investment option might need to be replaced. InterServ then evaluates potential replacements and makes recommendations to the Plan's Investment Committee for approval.

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

InterServ has entered into, and in the future may enter into, contractual agreements with individuals and organizations that "solicit" clients on behalf of InterServ. While the specific terms of each arrangement may differ, generally a solicitor's compensation is based upon the value of the referred client's assets to be serviced by InterServ. There is an exception to solicitor's compensation for those that are DailyAccess and Verisight employees. The compensation for these DailyAccess and Verisight employees is based on their individual Sales compensation plans's. As disclosed to the client, the solicitor's compensation may or may not increase the referred client's fees beyond that which InterServ would otherwise charge the client or investor for its investment services had the client come directly to InterServ.

InterServ provides reporting services to their parent company, DailyAccess Corporation, for its retirement plan sponsors.

## **Item 15 – Custody**

InterServ does not maintain custody of any client assets.

## **Item 16 – Investment Discretion**

InterServ has discretionary authority over client's assets only for managed accounts, which is obtained through an executed Investment Advisory Agreement. Discretion over client assets is generally limited to establishing investment allocation percentages in the asset allocation models maintained by InterServ for certain clients. With the Plan Sponsor's authorization, InterServ will rebalance and adjust allocations to the models as often as needed. Within Mid-Atlantic's Model Exchange portfolios InterServ also has the discretion to replace funds and add asset categories to the portfolios.

## **Item 17 – Voting Client Securities**

InterServ does not vote proxies on behalf of their clients, nor does InterServ render any advice with respect to the voting of proxies.

## **Item 18 – Financial Information**

InterServ does not have any financial considerations that are likely to impair its ability to meet its contractual commitments to its clients.

## **Item 19 – Requirements for State-Registered Advisers**

Not applicable

**ADV Part 2B SUPPLEMENTAL BROCHURE**

**InterServ, LLC  
307 University Blvd. North  
Building 3, Suite 2900  
Mobile, AL 36688  
251-662-2516**

**Steven F. Schreiber  
C. Paul Tyborowski  
Michael E. Wojtaszek  
Andrew A. Brandt  
Lindsey E. Ellis  
Todd Guilfoyle**

**Dated: March 2014**

This brochure supplement provides information about the above-named professional that supplements the InterServ, LLC (“InterServ”) brochure. You should have received a copy of that brochure. Please contact us by email at [jwood@interservllc.com](mailto:jwood@interservllc.com) if you did not receive InterServ’s brochure or if you have any questions about the contents of this supplement.

Additional information about the above-named professionals is available on the SEC’s website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

Name: Steven F. Schreiber

Year of Birth: 1975

Formal Education: B.A., Economics and International Studies, University of Richmond M.B.A., Masters of Business Administration, Finance and Investments

Business Background: Director of Investments, InterServ, LLC 8/2008 – Present  
Senior Financial Analyst, Windham Vacation Ownerships, 4/2008-8/2008  
Senior Financial Analyst, HD Supply, 5/2007 – 4/2008  
Manager of Business Analysis, InCharge Institute of America, Inc. 2003 – 5/2007

Professional Designations: Chartered Financial Analyst (CFA)

To enroll in the CFA program, an individual must have a bachelor's degree or equivalent, or four years of qualified work experience. A CFA designation requires an individual to pass three exams that test the individual's knowledge of investments and finance. The CFA candidate is also required to understand and sign a professional conduct statement which commits the individual to the CFA Institute's Code of Ethics and Standards of Professional Conduct. These require adherence to a high level of integrity, professionalism and duty to clients among others.

## **Item 3 – Disciplinary Information**

Mr. Schreiber has no disciplinary information to disclose.

## **Item 4 – Other Business Activities**

Mr. Schreiber is not actively engaged in any outside, investment related business or occupation

## **Item 5 – Additional Compensation**

Mr. Schreiber does not receive additional compensation or economic benefit from any other source for providing investment advisory services to his clients.

## **Item 6 – Supervision**

Mr. Schreiber is supervised by the Chief Compliance Officer of InterServ, LLC, James O. Wood, III, who may be reached at 251-662-2516.

## **Item 7 – Requirements for State-Registered Advisers**

Not applicable

Name: C. Paul Tyborowski

Year of Birth: 1953

Formal Education: B.S., Computer Applications

Business Background: Managing Director, InterServ, LLC 3/2012 – Present  
Managing Director-Strategic Implementation, Manning and Napier Advisors, Inc.,  
01/2007 – 3/2012  
Principal, TMC Associates, 1/2006 – 1/2007  
President and CEO, RS Group Trust Company, 1/1999 – 1/2006  
Managing Director, Columbus Circle Investors, 11/1994 – 12/1997

Professional Designations: Series 63 and Series 65

### **Item 3 – Disciplinary Information**

Mr. Tyborowski has no disciplinary information to disclose.

### **Item 4 – Other Business Activities**

Mr. Tyborowski is a principal with TMC ASSOCIATES.

### **Item 5 – Additional Compensation**

Mr. Tyborowski does not receive additional compensation or economic benefit from any other source for providing investment advisory services to his clients.

### **Item 6 – Supervision**

Mr. Tyborowski is supervised by the Chief Compliance Officer of InterServ, LLC, James O. Wood, III, who may be reached at 251-662-2516.

### **Item 7 – Requirements for State-Registered Advisers**

Not applicable

Name: Michael E. Wojtaszek

Year of Birth: 1955

Formal Education: B.A., Accounting and Management, Aquinas College  
M.M., Masters of Management, Aquinas College

Business Background: Director of Advisory Services, InterServ, LLC 5/2009 – Present  
VP of Operations, DailyAccess Corporation, 2/2007-5/2009  
Registered Rep, Mutual Service Corporation, 1/2003 – 1/2007  
Principal/Group Employee Benefits, National Employee Benefits, 11/2005 – 7/2006  
Registered Rep, Rehmann Financial, 1/2003 – 11/2005  
Registered Rep, Financial Service Corp., 4/2001 – 1/2003  
Principal, HR/Employee Benefit, Rehmann Robson, 11/1994 – 1/2003

Professional Certification: Series 65

### **Item 3 – Disciplinary Information**

Mr. Wojtaszek has no disciplinary information to disclose.

### **Item 4 – Other Business Activities**

Mr. Wojtaszek is not actively engaged in any outside, investment related business or occupation

### **Item 5 – Additional Compensation**

Mr. Wojtaszek does not receive additional compensation or economic benefit from any other source for providing investment advisory services to his clients.

### **Item 6 – Supervision**

Mr. Wojtaszek is supervised by the Chief Compliance Officer of InterServ, LLC, James O. Wood, III, who may be reached at 251-662-2516.

### **Item 7 – Requirements for State-Registered Advisers**

Not applicable

Name: Andrew A. Brandt  
Year of Birth: 1985  
Formal Education: B.A., Finance, University of South Alabama  
Business Background: Analyst, InterServ LLC 4/2012 –Present  
Senior Compliance Analyst, DailyAccess Corporation, 6/2008 –4/2012

Professional Designations: ASPPA Qualified 401(k) Administrator (QKA), Qualified Pension Administrator (QPA)

To enroll in the Qualified 401(k) Administrator (QKA) credential, an individual must have a minimum of two years experience in retirement plan related matters. A QKA credential requires an individual to pass four exams that tests the individual's knowledge of retirement plan administration and compliance issues. All credentialed members must acquire 40 hours of Continuing Education (CE) credits in a two-year cycle.

To enroll in the Qualified Pension Administrator (QPA) credential, an individual must have a minimum of two years experience in retirement plan-related matters. A QPA designation typically requires an individual to have the QKA credential along with two additional exams that tests the individual's knowledge of administrative issues relating to defined benefits plans. All credentialed members must acquire 40 hours of Continuing Education (CE) credits in a two-year cycle.

Professional Certifications: Series 65

### **Item 3 – Disciplinary Information**

Mr. Brandt has no disciplinary information to disclose.

### **Item 4 – Other Business Activities**

Mr. Brandt is not actively engaged in any outside, investment related business or occupation

### **Item 5 – Additional Compensation**

Mr. Brandt does not receive additional compensation or economic benefit from any other source for providing investment advisory services to his clients.

### **Item 6 – Supervision**

Mr. Brandt is supervised by the Chief Compliance Officer of InterServ, LLC, James O. Wood, III, who may be reached at 251-662-2516.

### **Item 7 – Requirements for State-Registered Advisers**

Not applicable

Name: Lindsey E. Ellis

Year of Birth: 1981

Formal Education: B.A., Marketing, University of South Alabama  
M.B.A. Masters of Business Administration, University of South Alabama

Business Background: Investment and Fiduciary Support Specialist, InterServ, LLC 8/2008 –Present

Professional Certifications: Series 65

### **Item 3 – Disciplinary Information**

Ms. Ellis has no disciplinary information to disclose.

### **Item 4 – Other Business Activities**

Ms. Ellis is not actively engaged in any outside, investment related business or occupation

### **Item 5 – Additional Compensation**

Ms. Ellis does not receive additional compensation or economic benefit from any other source for providing investment advisory services to her clients.

### **Item 6 – Supervision**

Ms. Ellis is supervised by the Chief Compliance Officer of InterServ, LLC, James O. Wood, III, who may be reached at 251-662-2516.

### **Item 7 – Requirements for State-Registered Advisers**

Not applicable

Name: Todd J. Guilfoyle

Year of Birth: 1973

Formal Education: B.A., Economics ,Colby College

Business Background: Regional Director, Investment and Fiduciary Consulting, InterServ, LLC 9/2013 – Present  
Taft-Hartley Sales, Principal, Mercer 05/2010-9/2013  
Retirement Sales, New York Life Management, LLC 03/2006 – 05/2010  
Product and Service Consultant, Fidelity Investments 06/1999 – 03/2006  
Pension Consultant, Trustar Retirement Services 06/1998 – 06/1999  
Retirement Services Representative, State Street Bank 06/1996 – 06/1998

Professional Certifications: Series 6, 63, 65

### **Item 3 – Disciplinary Information**

Mr. Guilfoyle has no disciplinary information to disclose.

### **Item 4 – Other Business Activities**

Mr. Guilfoyle is not actively engaged in any outside, investment related business or occupation

### **Item 5 – Additional Compensation**

Mr. Guilfoyle does not receive additional compensation or economic benefit from any other source for providing investment advisory services to his clients.

### **Item 6 – Supervision**

Mr. Guilfoyle is supervised by the Chief Compliance Officer of InterServ, LLC, James O. Wood, III, who may be reached at 251-662-2516.

### **Item 7 – Requirements for State-Registered Advisers**

Not applicable