

Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Sachetta & Callahan, LLC. If you have any questions about the contents of this brochure, please contact us at: 781-233-4138, or by email at: info@sachetta.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 Sachetta & Callahan, LLC is available on the SEC's website at www.adviserinfo.sec.gov

June 30, 2015

Sachetta & Callahan, LLC

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Material changes since our last update on December 31, 2014 include:

- Addition of insurance & annuity sales as a client offering, and the inclusion of commissions received as compensation.
- Addition of Andrew Reitano, CLU® as an advisor with Sachetta & Callahan, LLC.
- Addition of David Sutcliffe as an advisor with Sachetta & Callahan, LLC

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 781-233-4138 or by email at: info@sachetta.com

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Advisory Business

Firm Description

Sachetta & Callahan, LLC, was founded in 1984 as Sachetta & Company, LLC. In 2013, Infinite Wealth Management, Inc. and Sachetta & Company, LLC merged to form the single firm of Sachetta & Callahan, LLC. The owners of Sachetta & Callahan, LLC have remained the same as they were as Infinite Wealth Management, Inc.

On August 5, 2013, Sachetta & Callahan, LLC acquired Financial Planning Horizons, Inc. of Portsmouth, NH

Sachetta & Callahan, LLC provides personalized confidential tax preparation, financial planning and investment management to individuals, profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, tax preparation, insurance review, investment management, education funding, retirement planning, and estate planning.

Sachetta & Callahan, LLC is a fee-based tax, financial planning and investment management firm. The firm does not receive commissions for purchasing or stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm does receive commissions from the sale of insurance and annuity products. No finder's fees are accepted.

Sachetta & Callahan, LLC does not act as a custodian of client assets. The client always maintains asset control. Sachetta & Callahan, LLC places trades for clients under a limited power of attorney.

Other professionals (e.g., lawyers, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone or in person, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Joseph Sachetta, Michael Callahan, and Stephen Sachetta are each 33.33% owners.

Types of Advisory Services

Sachetta & Callahan, LLC provides investment supervisory services, also known as asset management services; manages investment advisory

accounts not involving investment supervisory services and furnishes investment advice through consultations.

Sachetta & Callahan, LLC also furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and other services that often include estate planning.

Sachetta & Callahan, LLC may receive commissions as the result of life insurance and/or fixed annuity sales.

As of June 30, 2015, Sachetta & Callahan, LLC manages approximately \$102.5 million in assets for approximately 230 clients, all on a discretionary basis.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$1,500.

Follow-on implementation work is billed separately at the rate of \$200 per hour.

Wealth Management Advisory Agreement

Most clients choose to have Sachetta & Callahan, LLC manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing

basis. Sachetta & Callahan, LLC offers these clients our investment management services, financial planning services, unlimited consultations, and the annual preparation of their personal income tax returns.

The annual Wealth Management Advisory Agreement fee is based on a percentage of the investable assets according to the following schedule for new clients:

- _1.50%_ on the first \$250,000 of Assets Under Management
- _1.00%_ on the next \$250,000 of Assets Under Management
- _0.75%_ on the next \$250,000 of Assets Under Management
- _0.50%_ on assets above \$1,000,000

The minimum annual fee is \$3,750 and is not negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Wealth Management Advisory Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The average portfolio value for the month prior to termination is used as the basis for the final fee computation, adjusted for the number of days during the billing month prior to termination.

Tax preparation work is performed as an integral part of the Wealth Management Advisory Agreement. Eligible federal and applicable state returns are filed electronically without an additional fee.

Hourly Planning Engagements

Sachetta & Callahan, LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.

Asset Management

Assets are invested primarily in no-load mutual funds and exchange-traded funds through our account custodians. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. There may be a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Sachetta & Callahan, LLC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Sachetta & Callahan, LLC.

Income Tax Preparation

Sachetta & Callahan, LLC provides tax preparation services to individuals and small businesses. Individual clients who meet our minimum fee of \$3,750 per year receive their income tax preparation at no additional cost. Individuals and small businesses who engage us for these services outside of a Wealth Management Advisory Agreement do so at a separately negotiated fee.

Insurance and Fixed Annuity Sales

Sachetta & Callahan, LLC provides life insurance and fixed annuity sales to interested clients. We may receive a commission on these sales, and they in no way effect any Asset Management, Financial Planning, or Income Tax Preparation fees. These sales are typically provided during the financial planning process, and clients are invited to take advantage if interested. Clients are welcome to purchase their insurance and/or fixed annuities from another provider without any adverse effect to any other relationship we may have. Our Massachusetts insurance license number is 1980060.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Sachetta & Callahan, LLC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Sachetta & Callahan, LLC will refund any unearned portion of the advance payment.

Sachetta & Callahan, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Sachetta & Callahan, LLC will refund any unearned portion of the advance payment.

Fees and Compensation

Description

Sachetta & Callahan, LLC bases its fees on a percentage of assets under management, hourly charges, and fixed fees. Insurance and annuity products are sold and generate a commission.

Financial plans are priced according to the degree of complexity associated with the client's situation, with a minimum fee of \$1,500.

Fees are not negotiable.

Fee Billing

Investment management fees are billed either monthly or quarterly, in arrears, meaning that we invoice you *after* the monthly billing period has ended. Fees are based on the *average* account balance during the preceding month or quarter. Fees are deducted from a designated client account to facilitate billing.

Fees for financial plans are billed upon completion, with the balance due upon delivery of the financial plan.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Sachetta & Callahan, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Sachetta & Callahan, LLC, but Sachetta & Callahan, LLC receives no portion of the mutual fund expense ratio.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Sachetta & Callahan, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

Sachetta & Callahan, LLC generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$250,000 of assets under management, which equates to an annual fee of \$3,750.

When an account falls below \$250,000 in value, the minimum annual fee of \$3,750 is charged. Depending upon circumstances, Sachetta & Callahan, LLC will sign an *Hourly Agreement* with the client if assets have diminished significantly below \$250,000.

Sachetta & Callahan, LLC has the discretion to waive the account minimum. Exceptions may apply to employees of Sachetta & Callahan, LLC and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Sachetta & Callahan, LLC may use include Morningstar Office mutual fund information, Morningstar Office stock

information, Fidelity Investments research information, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. This means that we use mutual funds and exchange traded funds to develop a well-diversified portfolio. Portfolios are globally diversified to control the risk associated with traditional markets. Diversification may be adjusted periodically depending on the investment markets, or the client's financial situation and risk tolerance.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of

profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Activities

Sachetta & Callahan, LLC also provides income tax preparation services to individuals and small businesses. Clients who elect to engage us for those services outside of a Wealth Management relationship pay a separate fee solely for those services.

Affiliations

Sachetta & Callahan, LLC has arrangements that are material to its advisory business.

Joseph Sachetta is on the Board of Directors at the Everett Co-Operative Bank.

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

Code of Ethics

The employees of Sachetta & Callahan, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Sachetta & Callahan, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Sachetta & Callahan, LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of Sachetta & Callahan, LLC is Michael J. Callahan. He/she reviews all employee trades each quarter. His/her trades are reviewed by Joseph Sachetta. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

Sachetta & Callahan, LLC does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Sachetta & Callahan, LLC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Sachetta & Callahan, LLC uses Fidelity Investments as custodian for our client accounts.

Sachetta & Callahan, LLC does not receive fees or commissions from any of these arrangements.

Soft Dollar Practices

Fidelity may provide research information in expectation of future business. Custodians may provide discounted software or discounted subscriptions with the expectation of future business

Fidelity may send compliance newsletters and other publications that are very helpful in maintaining an up-to-date compliance program. The Company does not pay for these publications.

Fidelity provides web-based software to access client accounts and to upload advisory fee invoices for direct debit. The Company does not pay for this capability.

Fidelity holds periodic conferences offering education on current topics relevant in the investment and financial planning world. The Company may attend these conferences from time to time at no cost.

Exhibitors at conferences pay a significant amount of money to exhibit. Exhibitor fees reduce the attendee fees that the Company advisers have to pay to attend the conferences. As a means of thanking exhibitors for their support, the Company advisers visit the exhibitors' booths.

Client Referrals

Sachetta & Callahan, LLC does not compensate brokers with client referrals.

Directed Brokerage

Sachetta & Callahan, LLC does not direct trades to any specific brokerage. Fidelity Investments executes all trades on behalf of our clients.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed periodically, typically quarterly, by our Investment Committee. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic investment performance communications on at least a quarterly basis.

Client Referrals and Other Compensation

Incoming Referrals

Sachetta & Callahan, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other

similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Sachetta & Callahan, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

Account Statements

All assets are held at our qualified custodian, which means the custodian provides account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Sachetta & Callahan, LLC.

Investment Discretion

Discretionary Authority for Trading

Sachetta & Callahan, LLC accepts discretionary authority to manage securities accounts on behalf of clients. Sachetta & Callahan, LLC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used. Sachetta & Callahan, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment strategy that we have discussed with you.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

Sachetta & Callahan, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Sachetta & Callahan, LLC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

Sachetta & Callahan, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Sachetta & Callahan, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

Sachetta & Callahan, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Information Security Program

Information Security

Sachetta & Callahan, LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Sachetta & Callahan, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Education and Business Standards

Sachetta & Callahan, LLC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, CLU, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Joseph Sachetta, CFP®, CPA/PFS

Educational Background:

- Bentley College, Bachelor's Degree in Accountancy, 1980
 - Bentley College, MBA, 1983
 - Bentley College, Master's Degree in Taxation, 1987
-
- Date of birth: 2/25/1958

Business Experience:

- Sachetta & Callahan, LLC (f/k/a Sachetta & Company, LLC)
 - 1984 – Present
 - Partner
- Infinite Wealth Management, Inc.
 - 2007 – 2013
 - Principal

- Quest Financial Services, Inc.
 - 1998 – 2007
 - Principal

Disciplinary Information: None

Other Business Activities:

- Board of Directors, Everett Co-Operative Bank

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Michael J. Callahan, CPA, CFP®, MST

Educational Background:

- Merrimack College, Bachelor's Degree in Finance, 2003
- Bentley University, Master's Degree in Taxation, 2009

- Date of birth: 2/19/1981

Business Experience:

- Sachetta & Callahan, LLC (f/k/a Sachetta & Company, LLC)
 - Partner, 2011 - Present
 - Staff Accountant, 2003 - 2011
- Infinite Wealth Management, Inc.
 - Principal
 - 2007 – 2013
- Quest Financial Services, Inc.
 - Financial Advisor
 - 2002 - 2007

Disciplinary Information: None

Other Business Activities: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Andrew Reitano, CLU®**Educational Background:**

- UMass Boston, Bachelor's Degree in History, 1993

- Date of birth: 12/08/1970

Business Experience:

- Sachetta & Callahan, LLC
 - o Financial Advisor, 2015 - Present
- New York Life Insurance Company
 - o Insurance Planning, 2008 - 2015
- United States Air Force
 - o Public Affairs, 1993-2010
- Federal Reserve Bank – Boston
 - o Communications, 2000-2007

Disciplinary Information: None

Other Business Activities: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

David Sutcliffe, CFP®**Educational Background:**

- UMass, Bachelor's Degree in English, 1973

- Date of birth: 9/15/1947

Business Experience:

- Aragorn, LLC, 1985 - 2015
 - o Financial Advisor
 - o Chief Investment Officer

Disciplinary Information: None

Other Business Activities: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Stephen Sachetta, CPA, MST**Educational Background:**

- Bentley University, Bachelor's Degree in Accounting, 1983
- Bentley University, Master's Degree in Taxation, 1987

- Date of birth: 2/12/1961

Business Experience:

- Sachetta & Callahan, LLC (f/k/a Sachetta & Company, LLC)
 - o Partner, 1984 - Present
- Infinite Wealth Management, Inc.
 - o Principal
 - o 2007 – 2013

Disciplinary Information: None

Other Business Activities: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None