

**Item 1: Cover Page**

**PASI INVESTMENTS, LLC**  
**SEC Form ADV Part 2A**  
**“Brochure”**

231 Farmington Avenue  
Farmington, CT 06032

Telephone: 1.877.313.5470

**April 10, 2017**

This Brochure provides information about the qualifications and business practices of PASI Investments, LLC (hereinafter “PASI”). If you have any questions about the contents of this Brochure, please contact us by telephone at (877) 313-5470 or by email at [dwetsman@pasiusa.com](mailto:dwetsman@pasiusa.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Additional information about PASI Investments, LLC is also 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. PASI Investments, LLC CRD number is 145640. While PASI Investments, LLC is an SEC-registered investment adviser, such registration does not imply a requisite level of skill or training.

## **Item 2: Material Changes**

Information in this Brochure has been amended since the last update filed on March 29, 2016. There were no material changes to PASI's brochure.

In addition, other information not specified in this summary has been revised. Consequently, we encourage clients to read this Brochure in its entirety.

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## **Item 4: Advisory Business**

### **INTRODUCTION**

Our firm, PASI Investments, LLC (hereinafter "PASI" or the "firm"), formed in 2007, is a registered investment adviser with its principal place of business located in Connecticut. Listed below are the firm's principal shareholders. Please note that Pension Administrative Services, Inc. is equally owned by David and Lori Wetsman.

Ronald Fishman  
Pension Administrative Services, Inc.

### **SERVICES OFFERED BY PASI INVESTMENTS, LLC**

#### *PENSION CONSULTING AND PENSION INVESTMENT MANAGEMENT*

Our firm provides retirement plan consulting to business owners and investment advice to sponsors of 401(k) or other self-directed retirement plans. Our plans typically are either "pooled accounts" where the plan trustees make all investment decisions, or "participant directed accounts" where employees are given the ability and responsibility to direct the investment of their retirement dollars. We seek to provide fiduciary guidance and education to the sponsors, trustees and participants to aid them in managing their investments successfully. Clients can impose restrictions on the investments included in their plans.

Our firm also provides:

- Ongoing educational materials and recommends model investment portfolios with various allocations based on age, risk tolerance, and personal circumstances.
- Record-keeping services including comprehensive quarterly participant account statements and ongoing review of investment models and selected funds so as to maximize investment performance.
- Investment advice to individuals, particularly those approaching retirement age, or in retirement.

Working with our clients, we develop an "Investment Policy Statement" for the account.

- For pooled account clients, we generally recommend no-load mutual funds, corporate securities, government securities and certificates of deposit. These recommended investments are intended to provide the investment choices and allocations necessary for clients to comply with the provisions in their Investment Policy Statement.
- For participant directed accounts, we generally recommend a selection of no-load mutual funds from the universe of available funds. These mutual funds are categorized

to represent a broad range of asset classes. We monitor the performance, management, and style changes of the funds in the plan, and make further recommendations when necessary.

For plan sponsors who have selected participant directed accounts, we will generally provide the plan participants with information on investment basics and asset allocation. The participants will then make their own initial and ongoing investment decisions as to allocation, fund selection, timing, etc... The nature of the topics of the information to be provided will be determined in a collaborative manner, under the guidelines established in ERISA Section 404(c).

PASI also provides participant directed accounts the option of offering PASI Model portfolios to their plan participants. These model portfolios offer (within the plan) a selection of managed portfolios representing different allocation strategies based on factors such as age, tolerance for risk and personal circumstances. The model portfolios generally consist of mutual funds selected from the universe of available no-load funds with a goal of consistent investment results and maximized performance. We may recommend changes to the model portfolios according to the goals of each model (not according to the individual needs of any of the plan participants). Any changes to the funds within the model portfolios must be approved by the plan sponsor in writing.

As noted above, we may provide educational materials to plan participants to assist them in managing their plan accounts, including determining the model portfolio that would be most suitable for their own particular investment goals and objectives. It is important to note that in such instances however, the plan sponsor, is our client, not the plan participants. The firm may assist participants in determining whether a model portfolio is appropriate for their goals and objectives (i.e., maximum capital appreciation, growth, income, or growth and income). In these instances, PASI may make recommendations to plan participants. When that occurs, PASI becomes a 3(38) fiduciary under ERISA to those plan participants.

PASI is deemed a fiduciary to our advisory clients that are employee benefit plans or individual retirement accounts (hereinafter "IRAs") pursuant to the Employee Retirement Income and Securities Act (hereinafter "ERISA"). 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, PASI may only charge fees for investment advice about products for which our firm does not receive any commissions or 12b-1 fees.

### *INDIVIDUAL PORTFOLIO MANAGEMENT*

Our firm also provides investment advice for individuals. Generally, account management is provided on a non- discretionary basis.

For individual clients, we generally recommend portfolios structured on an asset allocation basis, utilizing a broad range of asset classes. This asset allocation is determined based upon the goals and risk tolerance of each individual investor, as such is communicated to us. Investments choices within each asset class consist of, but are not limited to, stocks, bonds, mutual funds, exchange traded funds and certificates of deposits.

Our firm has approximately \$51,200,000 of non-discretionary assets under management as of December 31, 2016. Additionally, our firm has approximately \$153,400,000 in discretionary assets under management as of December 31, 2016. The firm's total AUM is approximately \$204,600,000.

## **Item 5: Fees & Compensation**

For the investment management services we provide, clients are charge an annual fee, assessed on a quarterly basis. These fees are negotiable based on the amount of assets in your account and may range from 0.10% to 1.00% or may be a fixed fee. The specific fee is set forth in the agreement between the client and the firm, and is based on a number of factors such as:

- The amount of assets in the account, including anticipated future additional assets.
- The nature and complexity of the services and reports provided.
- The number of plan participants.
- Portfolio style.
- Account composition.
- The type of retirement plan being serviced.
- Negotiations with the client.
- Other factors.

Moreover, PASI may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Our fees are billed monthly/quarterly in arrears at the end of each calendar month/quarter based upon the total value of your account assets at the end of the previous month/quarter. Fees can be deducted directly from the pooled or participant accounts, or can be invoiced to the account holder. There may be other fees associated with a client's account that are separate and distinct from the fees that are paid to the firm. These other fees may include:

- Mutual fund expense charges (expense ratio).
- Brokerage trading fees.
- Qualified plan record keeping charges.

The mutual fund expense charges are paid directly from account assets to the corresponding mutual fund company. Mutual fund expenses are always paid by plan participants (and are based on the mutual funds they choose to invest in). Detailed expense ratio information is included in the prospectus for each fund. All clients should carefully review the prospectus for each fund in their account.

Record keeping charges can be paid directly by the plan sponsor or can be paid from the participant's accounts. These fees are directly paid to a third party.

Termination of Agreement: Either the advisor or the client may terminate the agreement in writing at any time. The client is responsible to pay for services rendered until the termination of the agreement. The client can cancel the agreement without penalty within the first five days after the signing of the agreement.

## **Item 6: Performance-Based Fees & Side-by-Side Management**

PASI does not currently charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7: Types of Clients**

PASI provides investment consulting and investment management services to the following:

- Corporations and other legal business organizations that sponsor qualified and non-qualified retirement plans for their employees.
- Individuals who sponsor qualified retirement plans for themselves and/or their employees.
- Individuals, especially those nearing retirement, or in retirement.

For retirement plans, there is generally no minimum amount required, in order to open and an account with PASI. For individuals, there is generally a \$100,000 account minimum requirement (for opening and maintaining an account).

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

Our portfolio managers utilize a number of methods for analyzing and assessing the investments we recommend. The primary methods of assessment are:

1. Mutual Fund and ETF Analysis.
2. Industry and Collaborative Research.
3. Fundamental Analysis of individual securities (stocks & bonds, where applicable)

**Mutual Fund and/or ETF Analysis.** PASI's investment managers evaluate each investment fund based upon the criteria in the Investment Policy Statement (IPS) including, but not limited to, historical performance, Modern Portfolio Theory risk metrics, investment manager strategy/style, return vs. volatility, and fees. PASI attempts to mitigate risk by selecting funds and ETF's that have historically performed well relative to the market and the Morningstar category with less volatility (standard deviation of performance). Also, funds that have historically performed better than its peers in market corrections are utilized. PASI will select actively managed funds and will also offer low cost index options (passive funds) in its lineups.

Additionally, we look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. PASI also looks at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. Furthermore, PASI monitors the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF 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 or ETF, 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 or ETF, which could make the holding(s) less suitable for the client's portfolio.

**Collaborative Research.** PASI analyzes data delivered by research providers such as Morningstar and Marketsmith. PASI continuously monitors investment options utilizing published and on-line resources from various sources. We may also draw on the fundamental and economic research and talent provided by the various record keeping companies and plan custodians that we work with such as:

- Fidelity Investments.
- Charles Schwab & Co.



- Vanguard Investments.
- Dimensional Fund Advisors.
- John Hancock Retirement Plan Services.

Economic cycles and market trends may also be considered in evaluating the relative values of various funds and markets. PASI Model Portfolios are designed to be essentially fully invested at all times and will be managed with a long-term view. There are different model portfolios designed to meet the needs of different participants in view of age, resources, risk tolerance, etc. Allocation strategies in our model portfolios and fund recommendations in both our model portfolios and participant directed accounts are continuously reviewed to maximize performance.

PASI will provide plan participants with a broad range of initial and ongoing training materials to aid in their understanding of the investment markets, stocks and bonds and their differences, asset allocation strategies and the relationship of risk and reward in their accounts.

**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.

When analyzing companies, PASI focuses on the numbers through its proprietary quantitative approach – a composite scoring system developed over the manager’s extensive tenure and experience investing in the domestic equity markets. A significant amount of the data we analyze parallels what the majority of institutional investors on Wall Street focus on in their research departments. The theory behind this being we want to be aligned with stocks that other money managers are going to be building positions in. For PASI, the quality of a company’s financial condition, sales, and earnings will always be reflected by increasing institutional demand for the company’s stock.

PASI adheres to a bottom-up strategy with a top-down approach to identifying sectors or industries in market favor, developed and practiced over the past 10 years by veteran analyst and investor, Thomas M. Rianhard. The PASI approach seeks to identify stocks of companies entering a strong product cycle - potentially producing multiple quarters of above average growth - which is likely to be accelerating. The process examines earnings and sales growth, profit margins, return on equity, insider related activity, valuation measures, and industry analysis to arrive at a statistically significant number that is normalized and can be compared to all other companies in the mid/large cap equity universe. We also apply a relative strength overlay and technical analysis to arrive at a basket of stocks which, over time, possess a higher probability of outperforming the market.

## **MANAGING RISK OF LOSS**

It is important to keep in mind that all investments involve risk of losing value that clients should be prepared to bear. Notwithstanding, following the prudent investment strategies and educational practices mentioned above should help you and your plan participants avoid unnecessary risk.

PASI invests almost exclusively in U.S. common stocks (typically NASDAQ & NYSE issues), ADRs, and ETFs/ETNs (including both leveraged and inverse ETFs).

Diversification is a top priority at PASI. Our typical maximum position size for a stock is 3.5 to 4.9% - measured by purchase cost. This allows us to hold anywhere between 20- 40 positions at any given time, effectively managing investment (un-systematic) risk. Exchange Traded Funds and Exchange Traded Notes may have more concentrated positions, above 5%.

The firm will rarely add to a holding if the position is at a loss, although it may occur when both the fundamental and technical pictures remain intact.

PASI actively hedges the portfolio when market conditions warrant it. We utilize exchange traded funds, exchange traded notes and cash to mitigate market risk. The firm reserves the right to raise cash and, if necessary, add straight or leveraged market index ETFs to help reduce volatility in times of market turbulence.

In addition to hedging, PASI also employs a sell discipline. Typically, a position will be reduced should the composite score start to deteriorate, the technical picture worsens, or a negative data point emerges. We generally sell a security once it falls below our trailing stop threshold. PASI does not employ price targets, rather we wait for either the composite score or the stock's price action (or both) to tell us to sell.

PASI also strives to maintain portfolio liquidity. Securities are chosen from a multi-cap universe with a low price boundary of \$5. Investments are generally made in mid to large- cap stocks although some small-cap issues may qualify from time to time. In addition to this, a stock will only qualify for candidacy if it has enough trading volume to support entering/exiting the position without adversely impacting the price. This is typically an average 50 day trading volume of 500,000 shares a day or more. Finally, PASI normally does not purchase securities with a price below \$20 per share. That being said, PASI reserves the right to purchase/invest in stocks of companies below the minimum thresholds noted above should the portfolio manager feel they offer a superior risk/reward ratio.

Please note that future investment performance can vary from past performance and you should not base your decision to invest with PASI simply on past performance. Past performance is not an indicator of future performance. The investment returns of the PASI portfolio are not guaranteed, and the value of the investment may rise or fall.

In conclusion, the summary of material risks provided above is not meant to be a complete description of every risk that may be applicable. All investment activities involve a high degree

of risk, including the possible risk of loss of an investor's entire investment. The information contained herein is a summary only.

### **Item 9: Disciplinary Information**

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

There has never been any SEC or state regulatory body disciplinary events for our firm, our managers, or our investment representatives.

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

Our firm is affiliated with the following companies due to common ownership and/or control:

- i. PASI, LLC ("PASI, LLC").
- ii. PASI Payroll Services, LLC ("PPS").

**PASI, LLC** is a third-party administration company that advises business owners and plan sponsors in the selection, design, implementation and administration of their retirement plans. The services provided include advice as to plan selection and design so as to maximize the benefits of various plans to employees and their plan sponsors. The company also provides, through contacts with third parties, all plan administration including plan valuation, tax reporting, benefit payments, loan administration and plan compliance. PASI may refer clients in need of third-party administrative services to PASI, LLC. However, there are no referral fee arrangements between PASI and PASI, LLC for these recommendations.

Third-party administrative services provided by PASI, LLC are separate and distinct from the advisory services provided by PASI and provide for separate compensation. No PASI client is obligated to use PASI, LLC for any third-party administrative services and no client of PASI, LLC is obligated to utilize the advisory services of PASI. Sponsors or trustees of pension, profit-sharing, 401(k), IRA or other client accounts subject to the provisions of ERISA or the prohibited transaction provisions of the Internal Revenue Code are solely responsible for determining whether or not to engage the services of PASI.

**PPS** is a payroll processing company that provides full-service payroll administration to small businesses. PASI may refer clients in need of payroll processing services to PPS. However, there are no referral fee arrangements between PPS and PASI for these recommendations.

Payroll processing services provided by PPS are separate and distinct from the advisory services provided by PASI and provide for separate compensation. No PASI client is obligated to use PPS for any payroll processing services, and no client of PPS is obligated to utilize the advisory services of PASI.

#### **ADDRESSING ANY POTENTIAL CONFLICT OF INTEREST:**

Due to the above-mentioned affiliations, there may be the appearance of a conflict of interest when PASI personnel make recommendations or suggestions involving our affiliated companies. To address these concerns we take the following steps with each client:

- i. Disclose all relationships that have the potential to create a conflict of interest PASI and the respective client.
- ii. Describe the nature of the potential conflict of interest.

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

#### **CODE OF ETHICS**

PASI has adopted a Code of Ethics policy (hereinafter referred to as the “Code”) in accordance with Rule 204A-1 of the Investment Advisers Act of 1940 (hereinafter the “Advisers Act”). The purpose of the Code is to set forth certain key guidelines that have been adopted by us and to specify the responsibility of our personnel to act in accordance with their fiduciary duty to our clients and to comply with applicable federal and state laws and regulations. The Code requires that all employees conduct themselves in accordance with the highest ethical standards, which should be premised on the concepts of integrity, honesty and trust. The Code additionally includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons must acknowledge the terms of the Code. PASI 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, but to the general principles that guide the Code.

Our Code includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our Code also provides for oversight, enforcement and recordkeeping provisions.

Our Code 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.

A copy of PASI's Code is available to any client or prospective client upon request.

### **PARTICIPATION IN CLIENT TRANSACTIONS**

Owners of our firm, and our employees, may have an interest or position in certain investments which may also be recommended to a client. While we utilize only no-load mutual funds and corporate securities for our investment accounts, these situations may represent a conflict of interest. We have established the following procedures in order to ensure that we are fulfilling our fiduciary responsibilities:

1. PASI maintains a list of all securities holdings for itself, or any advisors associated with this firm.
2. PASI emphasizes the unrestricted right of the client to decline to implement any advice rendered.
3. PASI emphasizes the unrestricted right of the client to select any clearing firm, or in the case of a smaller or start-up plan, insurance group annuity carrier he/she wishes.
4. PASI requires that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
5. Any individual not in observation of the above may be subject to termination.

## **Item 12: Brokerage Practices**

### **BROKERAGE FOR CLIENT REFERRALS**

PASI has no referral relationships with any brokerage companies.

For individual accounts, IRAs, and certain retirement accounts, PASI requires such clients to use Charles Schwab and Interactive Brokers.

For the retirement plans that utilize a record keeper, PASI recommends that clients use American Funds, Fidelity Investments, Ascensus, Empower Retirement, and John Hancock.

PASI has no financial interest in such location of accounts or execution and will strive only to reduce plan cost, wherever possible.

We reserve the right to decline acceptance of any client account for which the client directs the use of a particular custodian if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of a particular custodian, it should be understood that PASI does not have the authority to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved.

The custodians provide our firm with access to institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at the custodial Institution. These services are not contingent upon PASI committing any specific amount of business (assets in custody or trading commissions).

The custodian's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For our client accounts maintained in its custody, these firms generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Custodial or that settle into those accounts.

These firms also make available to PASI, other products and services that benefit our firm but may not directly benefit our clients' accounts. Many of these products and services are used to service all or some substantial number of our client accounts, including accounts not maintained at the specific custodian. Products and services that assist us in managing and administering our 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 our fees from clients' accounts; and
- v. Assist with back-office functions, record keeping and client reporting, including electronic co-ordination with our practice management software.

The custodians make available, arrange and/or pay third-party vendors for the types of services rendered to our firm. They may also discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. The custodians also provide other benefits such as educational events or occasional business entertainment of our personnel.

In evaluating whether to recommend or require that clients custody their assets at a particular custodian, we take into account the availability of some of the products and services and other

arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by these firms, which creates a potential conflict of interest.

#### **AGGREGATION**

PASI does not aggregate client transactions.

### **Item 13: Review of Accounts**

Generally, our clients have their portfolio reviewed quarterly, with additional reviews and client meetings conducted on an annual basis. Reviews are generally conducted by a Partner and Chief Investment Strategist from PASI or in conjunction with the client's record keeper.

Our PASI Model portfolios will be continuously reviewed in view of performance, management or style changes, size and cost. Client plan participants who have decided to invest in our PASI Model Portfolios can further expect periodic reviews of asset allocation percentages based on market conditions and outlook. Client plan participants will be responsible for their own regular reviews in terms of allocation, purchases, timing, etc..., with PASI providing recommendations as to the funds used and their performance. We generally update our educational materials annually, and communicate investment results to participants periodically.

Plan sponsor clients will generally receive a quarterly summary pertaining to plan level asset holdings. All plan participants will receive summary statements quarterly directly from their custodian. Such statements will include fund balances, total account balances, allocation percentages, vested balances, account activity, including employee contributions and any company match. Individual clients will generally receive monthly account statements directly from their custodian.

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

PASI does not have any formal, referral relationship with any individuals or organizations. We do not pay any individual or organization for referrals, nor do we provide any other form of compensation or benefits for referrals. It is also the firm'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 advisory services we provide our clients.

### **Item 15: Custody**

All of PASI's assets are held in the custody of unaffiliated, qualified custodians.

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. Clients are urged to carefully review the custodial statements to verify account transactions, holdings and values among other things. Clients should contact us directly if they believe that there may be an error in their statement.

### **Item 16: Investment Discretion**

In most cases, pursuant to client agreements, PASI does have discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for an account. Any changes to investments, including investments in the PASI Model portfolios will be presented to clients as a recommendation. PASI requires written approval prior to implementing these recommendations.

In certain relationships, PASI has discretionary authority, pursuant to its written or oral investment management agreements with clients, to determine, without obtaining specific client consent, the securities to be bought or sold, the amount of the securities to be bought or sold, the brokers or dealers through which transactions will be executed, and the amount of commissions or mark ups or mark downs paid. Any restrictions or limitations on PASI's discretionary authority must be made in writing.

### **Item 17: Voting Client Securities**

As a matter of firm policy and practice, PASI does not have any authority to and does not vote proxies on behalf of clients.

The plan sponsors retain the responsibility for receiving and voting proxies for any and all securities maintained in plan portfolio. However, the firm may, upon request, provide advice to



clients regarding the voting of proxies. Clients may contact PASI with any questions about solicitations.

All proxy voting information will be sent directly to the client by their custodian or transfer agent.

### **Item 18: Financial Information**

Registered investment advisers are required in this Item to provide certain financial information or disclosures about the firm's financial condition. PASI does not have any financial commitments that impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.