



Form ADV Part 2A

Firm Brochure

(Amended 11/13/2018)

Achieve Wealth Partners LLC

400 Linden Oaks, Suite 310
Rochester, NY 14625

Telephone: 585-586-8100
E-mail: amasood@AchieveWealthLLC.com

This brochure provides information about the qualifications and business practices of Achieve Wealth Partners LLC (hereinafter “AWP” or “firm” or “we”). If you have any questions about the contents of this brochure, please contact us at (585) 586-8100 or at amasood@AchieveWealthLLC.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 AWP is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for AWP is 298540. Registration with the SEC does not imply any level of skill or training.

Item 2. Summary of Material Changes

This Firm Brochure is our disclosure document prepared according to the SEC's requirements and rules applicable to registered investment advisers. As you will see, this document is a narrative providing detailed information regarding our firm, its practices, fees, actual and potential conflicts of interest and key mitigating circumstances, policies and controls.

This Item 2 will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with SEC rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Since our last filing, we have the following material changes to report to Form ADV Part 2A:

- Our principal place of business address has changed to 400 Linden Oaks, Suite 310, Rochester, NY 14625

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Item 4. Advisory Business

Achieve Wealth Partners LLC (“AWP”) is an independent, fee-only SEC-registered investment adviser with its principal place of business located in Rochester, New York. We have been in business since 2018 with Forte Capital LLC, an independent, fee – only SEC-registered investment adviser, as the principal owner.

We do not have any assets under management to report.

AWP provides the following advisory services:

Portfolio Management Services:

AWP provides discretionary and non-discretionary investment management services based on each client’s individual needs. Through personal discussions and questionnaires, AWP creates an Investment Policy Statement ("IPS") for most clients that outline the client's asset allocation. For employee benefit plans ("Plans"), we will rely on the Plan's IPS. If requested, AWP will assist a Plan in developing their IPS. AWP constructs and manages client's investment portfolios based on their investment policy.

Based on the client's risk tolerance, tax considerations, liquidity needs, time horizons, etc., clients may have different securities in their portfolio. In addition, clients may experience different levels of service based on their particular situation or requirements.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, certain industries or sectors and social responsibility policies.

Where AWP is engaged on a discretionary basis, AWP may manage portfolios directly or may retain one or more SEC-registered investment advisers to sub-advise all or a portion of a client’s account as the situation may dictate. AWP may retain Forte Capital LLC (“Forte”), an SEC-registered investment adviser, as a sub-adviser to manage all or a portion of a client’s account. Forte is related to AWP by virtue of common ownership and control. If AWP chooses to delegate sub-advisory responsibilities for some or all of a client account, clients are required to use those sub-advisory services as delegated unless the sub-adviser, in its sole discretion, chooses not to accept a particular client or sub-advised account.

Financial Planning Services:

Advice is rendered in a broad number of areas including: cash flow planning, investment risk management, retirement planning, asset allocation and investment selection, college funding strategies, and estate and insurance planning. AWP gathers required information through personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. A retirement cash flow report is prepared and provided to some clients. Should a client choose to implement our recommendations, AWP suggests that

the client work closely with his or her attorney, accountant, and insurance agent. Implementation of financial planning recommendations is entirely at the client's discretion.

Under the terms of an administrative services agreement entered between AWP and Forte, AWP may engage with and utilize the financial planning professionals and analytical tools and services of Forte in the delivery of financial planning solutions.

Financial planning recommendations are not limited to any specific product or service offered by a broker dealer or insurance company.

AWP may provide periodic investment consulting/asset allocation services for client's assets held "outside" (assets not under our investment management agreement) such as 401(k), 403(b), and investment accounts held at other firms. AWP generally does not charge for these services and accordingly does not provide continual supervisory services for these "outside" assets. The client retains absolute discretion over these "outside" assets and AWP will not be responsible for the selection, performance or suitability of assets that the client holds in "outside" assets. Additionally, these assets are not included in the calculation for assets under management.

In the event that a client requests AWP to actively monitor "outside" assets as an integral part of our comprehensive engagement, a fee may be charged and the "outside" assets may be included under our investment management agreement.

Services in General

Neither AWP's nor Forte's investment recommendations are limited to any specific product or service offered by a broker dealer or insurance company and will primarily include advice regarding the following instruments:

- Equity Securities
- Debt securities, including corporate debt, US government, municipal debt
- Certificates of Deposit (CDs)
- No-load or load-waived mutual funds
- Exchange-traded funds (ETFs)
- Cash/short term investment vehicles

Investments in any accounts sub-advised will typically be limited to those offered by the selected sub-adviser(s).

Item 5. Fees and Compensation

Portfolio Management Fees

Our fees for Portfolio Management Services, including sub-advisory services, are based upon a percentage of assets under our management, in accordance with the following fee schedule:

Assets Under Management	Maximum Annual Fee
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First \$1 million	1.00%
Next \$2 million	0.90%
Next \$2 million	0.85%
Next \$4 million	0.65%

We bill our discretionary and non-discretionary clients on a quarterly basis and fees are paid in advance using a fee schedule clearly described in each client's investment advisory contract. AWP, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its portfolio minimum based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). The fee will equal the applicable percentage of the market value of the assets in client account(s) on the last business day of the preceding calendar quarter (e.g., billing for the quarterly period January through March will be based on December's ending market value). In the event that the relationship is commenced or dissolved in the midst of a billing period, the fees will be pro-rated on a daily basis for the period outstanding, and paid/refunded accordingly. Generally, AWP has the authority to deduct fees from client accounts, however, some clients pay by check.

Financial Planning Fees:

AWP may provide financial planning services to investment management clients at no additional cost as dictated by the complexity of their situation. Other clients may have a fixed fee arrangement, typically ranging from \$250 to \$500 per year and payable in advance. Some clients may pay AWP for the services of our professional personnel at our then-current hourly rate, typically ranging from \$150 and \$250 per hour. Our rates are subject to periodic revision. We may charge for the time our professional personnel spend on client accounts, including time spent in meetings with clients and others, time spent on telephone calls and other communications, and time spent on study, planning, analysis, preparation of reports and other work done by our professional personnel. Payments not included in the advisory fee charged, are payable within 30 days after receipt of our invoice. Clients may also authorize AWP to debit the fee from their account.

Fees in General:

Household Aggregation: We may group certain related client accounts for the purposes of determining the account size and/or annualized fee.

Administrative services and sub-advisory fees: As compensation to Forte for administrative services provided to AWP, a portion of the client's advisory fee paid to AWP is remitted to Forte for those services. In the event that Forte (or another investment adviser) is retained as a sub-adviser, a portion of the client's advisory fee paid to AWP is remitted to Forte (or another investment adviser) for its sub-advisory services.

Certain client agreements may be governed by fee schedules different from those listed above.

Account Termination and Refunds:

Clients may terminate the advisory agreement by providing us with a 30-day notice at our principal place of business. This notice requirement may be waived at our discretion. If you notify your account's custodian that you're terminating the custodial account linked to your separately managed account with our firm, we will consider this to constitute a notice of termination.

Upon termination of an account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

We will have no obligation to recommend or take any actions with regard to the securities, cash or other investments in a terminated account, but we may, at our discretion, assist you in liquidating assets and in effecting the transfer of assets to a new custodian designated by you.

Mutual Fund and ETF Fees and Expenses: All fees paid to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in a mutual fund or an ETF directly, without the services of our firm. In that case, the client would not receive the services provided by us which are designed, among other things, to assist the client in determining which mutual fund or funds or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Brokerage, Custodial and Other Transaction Fees

In addition to advisory fees paid to our firm, clients will also be responsible for all transaction, brokerage, trade-away and custodial fees incurred as part of their account management. Please see Item 12 of this Brochure for important disclosures regarding our brokerage practices.

Item 6. Performance-Based Fees and Side-By-Side Management

We do not charge any fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7. Types of Clients

AWP provides advisory services to a variety of clients including but not limited to the following types of clients: professional athletes, entrepreneurs and their companies, families of wealthy individuals, pension and profit sharing plans, corporations, corporate pensions and profit sharing plans, endowments, foundations, trusts, estates and charitable institutions.

There is no minimum account size or annual fee for portfolio management services, financial

planning services or associated consulting.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Associated Risks

AWP has the ability to vary the client's exposure to equities, fixed income and cash versus the client's stated IPS or otherwise stated mandates and/or objectives depending on overall market conditions. Performance of client portfolios may not track movements in the overall stock and bond markets, particularly over the short-term. While the intent of our strategies is long-term capital appreciation, total return, income or protection of capital, the investment return and principal value may fluctuate or deviate from overall market returns to a greater degree than expected.

Types of Investments:

Portfolio holdings will typically be limited to domestic and foreign equity securities, ETFs, preferred securities, Master Limited Partnerships, corporate debt securities, certificates of deposit, municipal and United States government and agency securities, mutual funds, and options.

AWP may recommend alternative investments including: real estate, private equity, private debt, hedge funds, commodities and precious metals or other illiquid and non-traditional investments and strategies. Investments in these strategies may require that clients qualify under specific rules dictated by regulatory agencies. These types of investments are generally not recommended by AWP for most of its clients.

Investment Process and Strategy:

AWP's Investment Committee, in conjunction with Forte's Investment Committee, establishes and implements the investment strategy for AWP's clients. Forte, under the terms of the administrative services agreement, may provide AWP with periodic and/or ongoing investment recommendations and investment models.

Generally, AWP's and Forte's research employs economic, fundamental and technical analysis as well as a qualitative appraisal of each company's or mutual fund's management and business. We also use third-party newsletters, research, etc. Asset allocation is an important part of the process. AWP believes the most appropriate returns for clients are achieved by maintaining client specific asset allocations.

Individual Equity/Fundamental Analysis:

Individual equity research is company specific. AWP engages in stock evaluation that focuses on individual companies that meet AWP's quantitative criteria. Stock screens are run periodically to produce a list of companies for consideration. As market, economic and financial conditions change there may be stocks held in client accounts that do not meet the

criteria or maintained for tax considerations. AWP relies on third-party historical and projected data in the process. We believe that the information obtained is complete and accurate; however, no independent verification of the data, or company specific comments, have been performed

AWP's sources of investment information include external third-party research, internal research conducted by AWP, input from investment recommendations and investment models provided by Forte, and credit rating services.

We may also evaluate, SEC filings, inspections of corporate activities, annual reports, prospectuses, research materials prepared by others, as well as corporate rating services, financial newspapers and magazines and company press releases.

AWP uses:

- long term purchases (securities held at least one year)
- short term purchases (securities sold within a year)
- short term trading (securities sold within 30 days)

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.

Mutual Fund/ETF Analysis:

AWP reviews and analyzes mutual funds and ETFs using third-party research, proprietary screens, and also considers investment recommendations and investment models provided by Forte. This process typically includes quantitative and qualitative analysis of each fund. The due diligence is done with the fund manager or analyst and may be written and/or oral.

A risk of investing in mutual funds and/or ETFs 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 fund or ETF less suitable of the client's portfolio.

Fixed Income Securities:

Individual fixed income research is issuer specific. Portfolio duration is based on the risk profile of the client. AWP relies on internal and external fixed income and economic analysis as well investment recommendations and investment models provided by Forte and Moody's and S&P's credit analysis in determining appropriate securities for client portfolios.

There is an inverse relationship between interest rate movements and fixed income prices. Generally, when interest rates rise, fixed income prices fall and when interest rates fall, fixed

income prices rise. Generally the longer a bond's maturity, the more sensitive it is to this risk. Bonds may also be subject to call risk, which is the risk that the issuer will redeem the debt at its option, fully or partially, before the scheduled maturity date.

The market value of debt instruments may fluctuate, and proceeds from sales prior to maturity may be more or less than the amount originally invested or the maturity value due to changes in market conditions or changes in the credit quality of the issuer. Bonds are subject to the credit risk of the issuer. This is the risk that the issuer might be unable to make interest and/or principal payments on a timely basis. Bonds are also subject to reinvestment risk, which is the risk that principal and/or interest payments from a given investment may be reinvested at a lower interest rate.

Options:

In some circumstances, we may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

Risk of Loss:

Investing in securities involves risk of loss that clients should be prepared to bear. While AWP attempts to moderate these risks, there can be no assurance that its investment and trading activities will be successful or that clients will not suffer losses.

Clients should be aware of the following potential risks:

- No Guarantee of Investment Performance. AWP cannot guarantee it will achieve positive or competitive investment returns. Unanticipated market conditions, political developments, regulatory and other factors, many of which cannot be anticipated or controlled, could result in AWP not generating positive or competitive after-tax returns or in a client losing a portion of their investment.
- General Investment Strategy Risk. The majority of AWP's investment activities will be based upon a strategy that requires, among other activities, anticipating economic trends or changes, evaluating the industry and prospects of companies and correctly anticipating the timing, direction and magnitude of subsequent changes in the values of such securities. There can be no assurance that AWP will be successful at implementing and managing the foregoing activities and no assurance that general market conditions and other market forces, which may be beyond control, will not prevent AWP from successfully implementing and managing its investment strategy.
- General Economic and Market Conditions. General economic and market conditions such as interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws and national and international political circumstances may affect the success of AWP's investment activities. These factors may also affect the level and volatility of **security** prices and the liquidity of AWP's investments. Unexpected volatility or liquidity could impair AWP's profitability or result in losses.

- Foreign Companies. AWP may choose to invest in American Depositary Receipts (ADRs), which will subject AWP to certain risks not typically associated with investing in securities issued by domestic issuers. These risks include unfavorable changes in currency exchange rates, imposition of exchange control regulation by the U.S. or foreign governments, certain foreign or U.S. taxes, and economic or political instability or disruptions in foreign countries. Further, AWP may have access to less information about some non-U.S. companies compared to U.S. companies, and financial information may not be subject to comparable standards of companies traded in U.S. markets, making the basis for investment decisions less dependable.
- Insolvency of Brokers and Others. AWP may be subject to the risk of failure of the brokerage firms that execute the Firm's trades, the clearing firms that such brokers use, or the clearing houses of which such clearing firms are members.
- Effect of Substantial Withdrawals. Clients making substantial withdrawals within a short period of time could require liquidation of securities positions more rapidly than would otherwise be desirable, possibly reducing the value of the client's assets and/or disrupting AWP's investment strategy. Reduction in assets could make it more difficult to generate a positive return or to recoup losses due to reductions in AWP's ability to take advantage of particular investment opportunities.
- Tax Risks. Clients are urged to consult with a tax adviser with respect to the federal, state, and local tax consequences arising from investing with AWP.
- Third-Party Manager Risk. Since our firm may sub-advise client accounts to a third-party manager, traditional fundamental, technical or other securities analysis is not possible when formulating recommendations. Instead, we rely on a due diligence process of the third-party manager in determining whether to sub-advise our client accounts. It is our policy and practice to conduct initial due diligence and to monitor the third-party manager on an on-going basis to determine and evaluate the portfolio management team's background, experience and philosophy; the process by which the manager makes investment decisions; how those decisions are implemented; the manager's investment track record in both up and down markets; the manager's risk management controls, parameters and evaluation process, and the adequacy and effectiveness of the manager's operational and compliance controls and infrastructure. One of the primary risks of investing with a third-party manager based, in part, on successful past performance is that it may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for the sub-advised clients. Moreover, as we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent fraud or other business, regulatory or reputational deficiencies.

Retirement Rollovers-Potential for Conflict of Interest:

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual

Retirement Account (“IRA”), or (iv) cash out the account value (which could, depending upon the client’s age, result in adverse tax consequences). If AWP recommends that a client roll over their retirement plan assets into an account to be managed by AWP, such a recommendation creates a conflict of interest if AWP will earn an advisory fee on the rolled over assets. No client is under any obligation to rollover retirement plan assets to an account managed by AWP. AWP’s Chief Compliance Officer, Adil Masood, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

Item 9. Disciplinary Information

Our firm has no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

As disclosed earlier, our firm is related by common ownership and control to Forte Capital LLC, an SEC-registered investment adviser. Sub-advising client accounts to a related entity results in a conflict of interest since interests of both entities, at least in part, accrue to the benefit of the same individuals. To mitigate this conflict of interest, AWP conducts sufficient periodic due diligence on Forte to reasonably ensure that its sub-advisory services are initially appropriate and remain appropriate for AWP’s clients.

AWP has entered into an administrative services agreement with Forte. Under the terms of this agreement, Forte, for compensation, has undertaken to deliver various services to AWP, including providing AWP with office facilities and equipment, clerical, bookkeeping, accounting and recordkeeping services, regulatory compliance services, back-office services, trading services, financial planning tools and services, legal services and marketing and advertising support.

Item 11. Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Disclosure

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Our Code of Ethics 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 of Ethics 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 provides for oversight, enforcement and recordkeeping provisions. A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request to our Chief Compliance Officer at the firm’s principal office address.

Our firm or individuals associated with our firm may buy or sell securities identical to those

recommended to or purchased for customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. This practice results in a potential conflict of interest, as we may have an incentive to manipulate the timing of such purchases to obtain a better price or more favorable allocation in rare cases of limited availability.

We may aggregate our employee trades with client trades. In case there is a partial fill of a particular batch order, we will allocate all the purchases pro-rata, with each account paying average price.

To mitigate these potential conflicts of interest and ensure the fulfillment of our fiduciary responsibilities, we have established the following restrictions:

1. Prohibition against use of non-public information - no persons associated with our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry.
2. No persons associated with our firm may prefer his or her own interest to that of the advisory client.
3. All persons associated with our firm must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Any individual not in observance of the above may be subject to disciplinary action or termination.

Item 12. Brokerage Practices

While AWP recommends and initiates all discretionary and most non-discretionary trades in client portfolios that are managed directly by AWP, AWP implements those trades utilizing the Forte trading desk and personnel. Forte and any other investment adviser that AWP may designate as a sub-adviser have their own policies, practices and procedures with respect to brokerage, the description of which can be found in Forte's or another investment adviser's Form ADV Part 2A.

As part of its due diligence, AWP will seek to ensure that Forte or any other another investment adviser that may be designated as a sub-adviser has adopted written policies and procedures reasonably designed to ensure that the investment adviser will obtain best execution for trades placed on behalf of AWP clients and that the investment adviser endeavors to select brokers, dealers or other counterparties that will provide the best services at the reasonable commission rates e under the circumstances. It should be noted, however, that we do not have any direct influence or control over third-party investment advisers' selection of brokers or counterparties when executing transactions

We do not have any formal or informal soft-dollar arrangements and do not receive any soft-dollar benefits from any broker, dealer or other counterparty.

For clients in need of brokerage and/or custodial services and depending on client circumstances and needs, AWP and/or Forte will recommend the use of one of several broker

dealers, provided that such recommendation is consistent with our fiduciary duty to the client. Generally, for equity transactions, we will recommend the brokerage services offered by the client's custodian. The factors considered by our firm when making these recommendations are the broker dealer's ability to provide professional services, the firm's experience with the broker dealer, the broker dealer's reputation, the broker dealer's quality of execution services and costs of such services and the custodial platform provided to clients, among other factors.

If a client, when undertaking an advisory relationship with our firm, already has a pre-established relationship with a broker and instructs us to execute all transactions through that broker, it should be understood that under those circumstances, we will not have the authority to negotiate commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients since our firm may not be able to aggregate orders to reduce transaction costs or the client may receive less favorable prices.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker if we believe that this choice would hinder its fiduciary duty to the client and/or its ability to service the account or would not be acceptable to Forte.

Typically, with respect to fixed income transactions for accounts with prime brokerage, AWP accepts brokerage discretion and delegates such discretion to Forte to seek to obtain best execution for client transactions in these accounts, i.e., seeking to obtain not necessarily the lowest commissions but the best overall qualitative execution in the particular circumstances. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission/mark-up rates, research and other services which will help us in providing investment management services to clients. We may, therefore recommend (or use) the use of a broker who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Research services may be useful in servicing all our clients, and not all of such research may be useful for the account for which the particular transaction was effected.

Client's should read important disclosures regarding Forte's brokerage practices in Item 12 of Forte's Form ADV Part 2A.

Item 13. Review of Accounts

All investment policy, investment selection, performance of sub-adviser(s) and major review of advisory accounts are conducted by portfolio manager(s) who monitor accounts on an ongoing basis.

The following individuals are responsible for at least semi-annual client account reviews and third-party investment adviser reviews:

Adil Masood, Principal and Chief Compliance Officer.

Clients will receive at least quarterly account statements from their designated custodian(s). Clients may also receive additional statements from their sub-adviser, including items providing individual portfolio information including holdings, asset allocation and individual performance results versus benchmark performance. AWP will not provide any additional reports, unless specifically contracted for with a client.

Item 14. Client Referrals and Other Compensation

We may pay referral fees to employees or third parties for referring advisory clients to our firm. If a client is introduced to us by an unaffiliated solicitor, we may pay that solicitor an initial and/or an ongoing referral fee based on the percentage of the referred client's advisory fee paid to our firm.

Payment of referral fees for prospective client referrals creates a potential conflict of interest to the extent that such a referral is not unbiased and the solicitor is, at least partially, motivated by financial gain. Therefore, such a referral may be made even if our advisory services are not suitable to a particular client's needs or entering into an advisory relationship with us is not, overall, in the best interest of the client. As these situations represent a conflict of interest, we have established the following restrictions in order to ensure our fiduciary responsibilities:

1. All such referral fees are paid in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements;
2. Any such referral fee will be paid solely from our investment management fee, and will not result in any additional charge to the client;
3. If the client is introduced to us by an unaffiliated solicitor, the solicitor, at the time of the solicitation, will disclose the nature of his/her/its solicitor relationship and provide each prospective client with a copy of our Form ADV Part 2 Brochure, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between our firm and the solicitor, including the compensation to be received by the solicitor from us; and
4. All referred clients will be carefully screened to ensure that our fees, services, and investment strategies are suitable to their investment needs and objectives.

Item 15. Custody

Custody is defined as any legal or actual ability by our firm to access client funds or securities. All client funds and securities are held with one or more "qualified custodians." However, although our firm does not take actual possession of client funds or securities, we

are deemed to have constructive custody of certain client accounts and funds under current SEC interpretation and guidance. Therefore, we urge all of our clients to carefully review and compare the reviews of account holdings and/or performance results they receive from us to those they receive from their qualified custodian. Any discrepancies should be reported to us and/or the qualified custodian immediately.

Item 16. Investment Discretion

For clients granting us the discretionary authority to determine which investments and the size of investments to be bought or sold for their account(s) and the discretion to sub-advise their account(s), we request that such authority be granted in writing, typically in the investment advisory agreement.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in this written authority statement. Clients may change/amend these limitations as desired. Such amendments must be submitted to us by the client in writing and are subject to acceptance by the selected sub-adviser.

Item 17. Voting Client Securities

As a matter of firm policy and practice, AWP does not generally accept the authority to and does not vote proxies on behalf of advisory clients whose portfolios we manage directly.

Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios managed directly by AWP. Generally, clients receive proxies or other solicitations directly from the custodian or a transfer agent, and not from AWP.

AWP, however, may provide advice to you regarding your voting of proxies. Call us at 585-586-8100 or submit your inquiry via e-mail to amasood@achievewealthpartners.com. Clients may obtain a copy of AWP's proxy voting policies and procedures upon request.

In certain circumstances, AWP may be required to vote proxies as part of its fiduciary duties to certain ERISA plans. In such instances, AWP will vote proxies in a manner consistent with the investors stated goals. Those clients may promptly obtain a copy of how proxies for plan shares were voted by contacting Adil Masood directly.

For any sub-advised accounts, we will, in turn, delegate proxy voting authority to the selected sub-adviser to which the client's account is sub-advised, provided that such manager votes proxies for client accounts.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s). We will however, upon client request, file "Proofs of Claims" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18. Financial Information

Under no circumstances will we earn fees in excess of \$1,200 more than six months in advance of services rendered, and therefore we have no obligation to disclose our firm financials as part of this Brochure.

Our firm has no financial condition that impairs our ability to meet our contractual obligations to you and have never been the subject of a bankruptcy proceeding.