

Pollock Investment Advisory Corporation d/b/a Kalinowsky Asset Management

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Pollock Investment Advisory Corporation ("PIAC") If you have any questions about the contents of this brochure, please contact us at: 408-316-6272, or by email at: mark@kamcorp.cc. 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 PIAC is available on the SEC's website at <http://www.adviserinfo.sec.gov>

Item 2 Summary of Material Changes

Annual Update

Since the filing of our last annual updating amendment, dated March 31, 2023, we have the following material changes to report.

NO Material Changes

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Item 4 Advisory Business

Firm Description

Pollock Investment Advisory Corporation ("PIAC") was founded in 1984 and provides personalized confidential financial planning and investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and small businesses. Advice is provided through a series of personal consultations with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, investment management, education funding, retirement, and estate planning.

PIAC is strictly a fee-only financial planning and investment management firm. The firm is not affiliated with entities that sell financial products or securities and as such no commissions in any form are accepted for investment products such as annuities, limited partnerships, etc. No finder's fees are accepted.

Principal Owners

Mark Kalinowsky, President is a 100% stockholder of Pollock Investment Advisory Corporation.

Types of Advisory Services

PIAC provides investment supervisory services, also known as asset management services through the management of investment advisory accounts.

PIAC provides a free summary of the client's overall allocation of marketable securities. The focus of this analysis is to identify the portfolio risk, diversification, and expected return, and to help clients develop a long-term investment policy. PIAC develops a primarily passive management solution through a series of in-person interviews which results in the adoption of an investment policy statement that outlines an investment model to be implemented.

PIAC reports quarterly to its clients on their investment portfolio and rebalances these portfolios on a regular basis, or more often as needed.

PIAC's comprehensive planning may include some or all the services in the following general areas, depending upon the level of planning and complexity desired by the clients:

- Cash flow analysis
- Corporate benefit review
- Asset allocation
- Financial planning
- Monitoring & Rebalancing

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice).
- Never put our financial interests ahead of yours when making recommendations (give loyal advice).
- Avoid misleading statements about conflicts of interest, fees, and investments.
- Follow policies and procedures designed to ensure that we give advice that is in your best interest.

- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

As of December 31, 2023, we provide continuous management services for \$204,200,000 in client assets on a discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client files. Investment Policy Statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Advisory Service Agreement

Most clients choose to have PIAC manage their assets in order to obtain ongoing in-depth investment advice and financial planning. All aspects of the client's financial affairs are reviewed, including those of their children, when applicable. 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.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes cash flow management; investment management (including performance reporting); education planning; retirement planning; estate planning; as well as the implementation of recommendations within each area, as applicable.

Asset Management

Assets are invested primarily in no-load, or and exchange-traded funds through a primary custodian, National Financial Services LLC (Fidelity). These Custodians may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a custodial account when appropriate. The Custodian may charge a fee for stock and bond trades. PIAC does not receive any compensation, in any form, from fund companies.

In addition to mutual funds, ETFs, stocks and bonds, other investments may include, but are not limited to warrants, options, corporate debt securities, commercial paper, municipal securities, and U.S. government securities.

Initial public offerings (IPOs) are not available through PIAC.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying PIAC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. Since the client made an advanced quarterly payment, PIAC will refund any unearned portion of the advanced payment.

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

Item 5 Fees and Compensation

Description

PIAC offers investment advisory services for a percentage of assets under management for most of its advisory clients according to a scale.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

0-1 million	90 basis points
1 - 2 million	80 basis points
2 - 3 million	70 basis points
3 - 4 million	60 basis points
5 million plus.	40 basis points

There is no minimum annual fee, and the fee is negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Asset management includes all platform and reporting costs. The asset management fee does not include mutual fund and stock trade commission of approximately \$5.00-\$50.00 per trade.

Although the Advisory Service 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, PIAC will refund any unearned portion of the advance quarterly payment. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Fees are negotiable.

Fee Billing

Investment management fees are billed quarterly, in advance, meaning that we charge the management fee before the three-month billing period has begun. Payment in full is debited from each investment advisory account (generally), and the client must consent in advance to direct debiting of their advisory account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and all exchange traded securities. 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. PIAC, 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 "50 basis points" means that the mutual fund company charges 0.5% annually for their services. These fees are in addition to

the fees paid by you to PIAC.

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

Past Due Accounts and Termination of Agreement

PIAC reserves the right to stop work on any account that is more than 90 days overdue. In addition, PIAC reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in PIAC judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded.

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

Sharing of Capital Gains

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

PIAC 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.

Item 7 Types of Clients

Description

PIAC generally provides investment advice to individuals, high net worth individuals, pension, and profit-sharing plans, trusts, estates, or charitable organizations.

Client relationships vary in scope and length of service.

Account Minimums

There is no account size minimum.

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

Methods of Analysis

We believe investing should involve a long-term view and a systematic focus on sources of expected returns, not on stock picking or market timing. In constructing an investment portfolio, we focus on broad, global diversification customized to a client's goals, objectives, and constraints. We then place priority on managing client emotions, managing the tax efficiency of the portfolio by effectively managing portfolio turnover and keeping trading costs low. All investments come with the risk of losing money.

The main sources of information which PIAC may include written financial plans, client financial questionnaires, including tax returns, and employer prepared information, as well as insurance policies, wills, and trust documents.

Sources of information that PIAC relies on include the research platform provided through Fidelity Wealth Central, mutual fund companies, Envestnet, and the World Wide Web. Financial newspapers and magazines are used for the enrichment and knowledge of PIAC, but only for its own information, not used for business purposes.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a passive asset management approach. This means that we use passively managed index and exchange-traded funds as the core investments. From time to time, on a per client basis, a small number of individual securities may be added based on the client's personal views, biases, or goals. Portfolios are globally diversified to control the risk associated with traditional markets.

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. Each client has an Investment Policy Statement that documents their objectives and their desired investment strategy.

Risk of Loss

Note: All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Although PIAC advises assets in a manner consistent with risk tolerances, there can be no guarantee that our efforts will be successful. The investor should be prepared to bear the risk of loss.

Market Risks

Competition. The securities industry and the varied strategies and techniques to be engaged in by PIAC are extremely competitive and each involves a degree of risk. PIAC will compete with firms, including many of the larger securities and investment banking firms, which have substantially greater financial resources and research staffs.

Market Volatility. The profitability of PIAC substantially depends upon it correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. PIAC cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

Advisors Investment Activities. PIAC investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by PIAC. Such factors include a wide range of economic, political, competitive, technological, and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability of PIAC to realize profits.

Material Non-Public Information. By reason of their responsibilities in connection with other activities of PIAC and/or its affiliates, certain principals, or employees of PIAC and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. PIAC will not be free to act upon any such information. Due to these restrictions, PIAC may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Accuracy of Public Information. PIAC selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to PIAC by the issuers or through sources other than the issuers. Although PIAC evaluates all such information and data and sometimes seeks independent corroboration when it is considered appropriate and reasonably available, PIAC is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Investments in Undervalued Securities. PIAC intends to invest in undervalued securities. The identification of investment opportunities in undervalued securities is a difficult task, and there are no assurances that such opportunities will be successfully recognized or acquired. While investments in

undervalued securities offer the opportunities for above-average capital appreciation, these investments involve a high degree of financial risk and can result in substantial losses. Returns generated from PIAC investments may not adequately compensate for the business and financial risks assumed.

Investment Risks

Portfolios may invest substantially all of their available capital principally in securities, engages in short sales of securities and trades in options (including covered and uncovered puts and calls and over-the-counter options) and other derivative instruments, private securities, and money market instruments. Markets for such instruments fluctuate and the market value of any particular investment may vary substantially. In addition, such securities may be issued by unseasoned companies and may be highly speculative. The Fund's portfolio may not generate any income or appreciate in value.

Portfolio Turnover. The investment strategy of the Portfolios may require active trading of the portfolio, and as a result, turnover and brokerage commission expenses may significantly exceed those of other investment entities of comparable size.

Small Cap Companies. The Portfolios may invest a portion of its assets in the stocks of companies with small market capitalizations. While PIAC believes these investments often provide significant potential for appreciation, those stocks involve higher risks in some respects than do investments in stocks of larger companies. For example, prices of such stocks are often more volatile than prices of large-capitalization stocks. In addition, due to thin trading in some such stocks, an investment in these stocks may be more illiquid than that of larger capitalization stocks.

Lack of Diversification. The Portfolio portfolios may not be widely diversified among sectors, industries, geographic areas, or types of securities. Further, the portfolios may not necessarily be diversified among a wide range of issuers. Accordingly, the portfolios may be subject to more rapid change in value than would be the case if the Investment Vehicles were required to maintain a wide diversification among companies or industry groups.

Short-Sales. PIAC may sell securities short. Short sales can, in certain circumstances, substantially increase the impact of adverse price movements on the portfolios. A short sale involves the risk of a theoretically unlimited increase in the market price of the particular investment sold short, which could result in an inability to cover the short position and a theoretically unlimited loss. There can be no assurance that securities necessary to cover a short position will be available for purchase.

Options and Other Derivative Instruments. PIAC may invest, from time to time, in options and other derivative instruments, including, but not limited to, the buying and selling of puts and calls on some of the securities held by PIAC. The prices of many derivative instruments, including many options and swaps, are highly volatile. The values of options and swap agreements depend primarily upon the price of the securities, indexes, commodities, currencies, or other instruments underlying them. Price movements of options contracts and payments pursuant to swap agreements are also influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Options on highly volatile securities, currencies or other assets may be more expensive than options on other investments.

Hedging Transactions. Investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, other derivatives, and other investment techniques are commonly utilized by investment funds to hedge against fluctuations in the relative values of its portfolio positions as a result of changes in currency exchange rates, interest rates and/or the equity markets or sectors thereof. Any hedging against a decline in the value of portfolio positions

does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. PIAC is not obligated to establish hedges for portfolio positions and may not do so.

Leverage. The Portfolio will use leverage by engaging in short sales, entering into swaps and other derivatives contracts and other leveraging strategies. Such leverage increases the risk of loss and volatility. In addition, the use of leverage requires the pledging of assets as collateral. Margin calls or changes in margin requirements can cause the Portfolio to be required to pledge additional collateral or liquidate the Portfolio holdings, which could require the portfolio to close positions at substantial losses that would not otherwise be realized.

Market or Interest Rate Risk. The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If PIAC holds a fixed income security to maturity, the change in its price before maturity may have little impact on PIAC's performance; however, if PIAC has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to PIAC.

Fixed Income Call Option Risk. Many bonds, including agency, corporate and municipal bonds, and all mortgage-backed securities, contain a provision that allows the issuer to "call" all or part of the issue before the bond's maturity date. The issuer usually retains this right to refinance the bond in the future if market interest rates decline below the coupon rate. There are three disadvantages to the call provision. First, the cash flow pattern of a callable bond is not known with certainty. Second, because the issuer will call the bonds when interest rates have dropped, PIAC is exposed to reinvestment rate risk – PIAC will have to reinvest the proceeds received when the bond is called at lower interest rates. Finally, the capital appreciation potential of a bond will be reduced because the price of a callable bond may not rise much above the price at which the issuer may call the bond.

Inflation Risk. Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if PIAC purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds, or floating rate bonds, PIAC is exposed to inflation risk because the interest rates the issuer promises to make is fixed for the life of the security.

Investments in Non-U.S. Investments. From time to time, PIAC may invest and trade a portion of its assets in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social, and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- Enforcing legal rights in some foreign countries is difficult, costly, and slow, and there are sometimes special problems enforcing claims against foreign governments.
- Foreign securities and other assets often trade in currencies other than the U.S. dollar, and PIAC may directly hold foreign currencies and purchase and sell foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect PIAC net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies

may cause the value of PIAC investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of PIAC foreign currency holdings. If PIAC enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if PIAC enters forward contracts for the purpose of increasing return, it may sustain losses.

- Non-U.S. securities, commodities and other markets may be less liquid, more volatile, and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

Lack of Liquidity. The Portfolio may invest in thinly traded and relatively illiquid securities or those securities may not be traded at the time the Portfolio invest or may cease to be traded after the Portfolio invests. The Portfolio also may acquire significant positions in some securities. In such cases and in the event of extreme market activity, the Portfolio may not be able to liquidate its investments promptly if necessary. In addition, the Portfolios sales of thinly traded securities could depress the market value of those securities and thereby reduce the Portfolios profitability or increase its losses. Such circumstances or events could affect the Portfolios gain or loss materially and adversely.

Risk of Default or Bankruptcy of Third Parties. PIAC may engage in transactions in securities, commodities, other financial instruments, and other assets that involve counterparties. Under certain conditions, PIAC could suffer losses if a counterparty to a transaction were to default or if the market for certain securities, commodities, other financial instruments and/or other assets were to become illiquid.

Regulatory Risks

Strategy Restrictions. Certain institutions may be restricted from directly utilizing investment strategies of the type in which PIAC may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel, and accountants to determine what restrictions may apply and whether an investment in PIAC is appropriate.

Trading Limitations. For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject PIAC to loss. Also, such a suspension could render it impossible for PIAC to liquidate positions and thereby expose PIAC to potential losses.

Conflicts of Interest: In the administration of client accounts, portfolios, and financial reporting, PIAC faces inherent conflicts of interest which are described in this brochure. Generally, PIAC mitigates these conflicts through its Code of Ethics which provides that the client's interest is always held above that of the Firm and its associated persons.

Supervision of Trading Operations. PIAC, with assistance from its brokerage and clearing firms, intends to supervise, and monitor trading activity in the portfolio accounts to ensure compliance with firm and client objectives. Despite PIAC efforts, however, there is a risk that unauthorized or otherwise inappropriate trading activity may occur in portfolio accounts.

Depending on the nature of the investment management service selected by a client and the securities used to implement the investment strategy, clients will be exposed to risks that are specific to the securities in their particular investment portfolio.

Reliance on Management and Key Personnel. Investors have no right or power to take part in the management of PIAC. Accordingly, no investor should invest with PIAC unless such investor is willing to entrust all aspects of management to PIAC. The investment performance of PIAC portfolios depends largely on the skill of key personnel of PIAC, including, in particular, its sub advisors. If key personnel were to leave PIAC, it might not be able to find equally desirable replacements and the performance of the PIAC portfolios could, as a result, be adversely affected.

Security Specific Risks

Liquidity. Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation. The Portfolios may invest in thinly traded and relatively illiquid securities or those securities may not be traded at the time the Portfolios invest or may cease to be traded after the Portfolios invest. The Portfolios also may acquire significant positions in some securities. In such cases and in the event of extreme market activity, the Portfolios may not be able to liquidate its investments promptly if necessary. In addition, the Portfolios sales of thinly traded securities could depress the market value of those securities and thereby reduce the Portfolios profitability or increase its losses. Such circumstances or events could affect the Portfolios gain or loss materially and adversely.

Currency. 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.

Lack of Registration. LP interests have neither been registered under the Securities Act nor under the securities or "blue sky" laws of any state and, therefore, are subject to transfer restrictions.

Withdrawal of Capital. The ability to withdraw funds from LP interests is usually restricted in accordance with the withdrawal provisions contained in an Offering Memorandum. In addition, substantial withdrawals by investors within a short period of time could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, possibly reducing the value of the fund's assets and/or disrupting the fund's investment strategy.

Item 9 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.

Item 10 Other Financial Industry Activities and Affiliations

Financial Industry Activities

PIAC is not registered as a securities broker-dealer, nor is involved in any other business other than providing investment advice to its clients.

Affiliations

Some clients of PIAC (formerly Pollock Investment Advisory Corporation) may also be clients of Pollock Financial Group and/or Pollock Realty Corporation, where these entities provide both private real estate and insurance solutions to client's specific needs. While the client's relationship with these entities may be material to their overall financial plan, PIAC does not and has not reviewed the merit of any current or proposed real estate investment or insurance product that these entities recommend and as such, there is no compensation or remuneration between PIAC and these entities.

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

Code of Ethics

The employees of PIAC 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

PIAC 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 PIAC Compliance Manual.

Personal Trading

The Chief Compliance Officer of PIAC is Mark Kalinowsky. He reviews all trading activity for the employees of PIAC. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients receive preferential treatment.

Item 12 Brokerage Practices

Selecting Brokerage Firms

PIAC does not have any affiliation with broker dealers or custodians that require sales of investment products. Specific custodian recommendations are made to Clients based on their need for such services. PIAC recommends custodians based on the proven integrity, financial responsibility and the best execution of orders at reasonable commission rates. PIAC does not receive fees or commissions from any of these arrangements.

Best Execution

PIAC reviews the execution of trades at each custodian on a regular basis at a minimum of semi-annually. The review is printed and filed in the firm's best execution file. Trading fees charged by the custodians are also reviewed as part of this analysis. PIAC does not receive any portion of the trading fees.

Soft Dollars

PIAC has not entered into any soft dollar arrangements.

Order Aggregation

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

Item 13 Review of Accounts

Periodic Reviews

Account reviews are performed in person or by phone by Mark Kalinowsky on a quarterly basis, or as needed. 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

PIAC considers the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Advisory Service Agreement clients receive written quarterly reports. Annual written updates may include a net worth and/or portfolio statement.

Item 14 Client Referrals and Other Compensation

Incoming Referrals

PIAC 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, except as outlined under the Solicitor Agreement section below.

Referrals Out

PIAC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Solicitor Agreements

PIAC has not entered into any solicitor relationships.

Item 15 Custody

Account Statements

PIAC does not intend to maintain physical possession of client assets or securities. Assets in client accounts will be held in custody at Fidelity, or another independent qualified custodian. Clients may authorize PIAC to directly charge or issue instructions to charge advisory fees to their custodial accounts. Due to the nature of this "direct debit" billing procedure, PIAC will be considered to have custody of client assets as defined by regulation.

At least quarterly, Clients will receive account statements directly from the Custodian(s) which will include all transactions during the statement period. Clients should carefully review the Custodian statements promptly and compare these statements to the portfolio reports provided by PIAC. Clients should contact PIAC and the custodian directly if there are any discrepancies. All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Based on the No-Action Letter submitted by the Investment Adviser Association dated February 21, 2017, the SEC indicates that an adviser generally has custody if their client grants the adviser power in a standing letter of authorization ("SLOA") to conduct third party transfers (i.e. Instruct the qualified custodian to accept the adviser's direction on the client's behalf to move money to a third party designated in the SLOA). These SLOAs have been put in place upon the client's written request and signature. For instance, the amount or timing of the transfers may not be on the SLOA submitted to the custodian; however, at a future date, a client will contact PIAC requesting that the adviser submit instructions to the custodian to remit a specific dollar amount from the account to the designated third-party (both of which are identified in the SLOA that is on file). As further outlined in the No-Action Letter, PIAC is exempt from certain ongoing requirements of the Custody Rule as we comply with the stated conditions of the letter.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by PIAC offered through Envestnet.

Item 16 Investment Discretion

Discretionary Authority for Trading

PIAC accepts discretionary authority to manage securities accounts on behalf of clients. PIAC 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 and the transaction fees paid to the custodian. PIAC 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 policy that you have approved in writing.

However, PIAC consults with clients prior to executing any major strategic changes to their portfolios.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. Clients sign a limited power of attorney so that we may execute the trades on the client's behalf.

Item 17 Voting Client Securities

PIAC does not vote proxies on securities. Clients are expected to vote their own proxies.

Item 18 Financial Information

Financial Condition

PIAC 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 PIAC does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1200 per client, six months or more in advance.

Business Continuity Plan

Business Continuity Plan

PIAC 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. A summary of the business continuity plan is available upon request from the Chief Compliance Officer.

In the event of a business disruption event, PIAC maintains an alternate location designed to support on-going operations. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

PIAC maintains an information security program to reduce the risk that your personal and confidential information may be breached. In addition, PIAC maintains a set of policies and procedures designed to manage and protect his client's non-public personal information. PIAC does not sell information about current or former clients to third parties, nor is it my practice to disclose such information to third parties.

Privacy Notice

PIAC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

With your permission and at your direction, 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 Custodian in order to execute securities transactions on your behalf.

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.