



**Item 1    Cover Page**

**Part 2A of Form ADV: Firm Brochure**

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March 30, 2016

This brochure provides information about the qualifications and business practices of American Investment Services, Inc. ("AIS"). Should the reader have any questions about the contents of this brochure, please contact AIS at 888-528-1216 or [AisInfo@americaninvestment.com](mailto:AisInfo@americaninvestment.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about AIS is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Search the site using a unique identifying number, known as a CRD number. AIS's CRD number is 110043.

## **Item 2    Material Changes**

This Firm Brochure, dated March 30, 2016, is the annual revision of the disclosure document that AIS is required to file with the SEC and to deliver to prospective clients and make available to clients pursuant to SEC rules under the Investment Advisers Act of 1940. In conformity with those rules, AIS will provide each client with a summary of any material changes contained in this and subsequent Firm Brochures within 120 days after the close of each fiscal year on December 31<sup>st</sup>. AIS will also provide clients with other interim disclosures about material changes as necessary.

AIS's last annual update of its Firm Brochure was filed on March 31, 2015. While no changes that are deemed material under SEC rules have occurred since that date, there have been a number of organizational changes.

### **Board Changes**

- Neil D. Holden was elected Chairman at a meeting of the AIS board on February 18, 2016. He succeeds Gregory van Kipnis who continues to serve as a Director of AIS.

### **Staff Changes**

- Nicholas Bamberger, Associate Advisor, left the firm effective January 15, 2016.
- Christine Weaver resigned as Chief Compliance Officer and left the firm, and John Barry, the President of AIS, assumed the role of CCO, effective September 9, 2015.
- Luke Delorme joined AIS as Director of Financial Planning, effective March 8, 2016.
- Tricia Storti, joined AIS as Client Services Administrator, effective March 8, 2016.

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## **Item 4    Advisory Business**

### **GENERAL INFORMATION**

AIS, an SEC-registered investment adviser incorporated in Delaware with its principal place of business located in Massachusetts, began conducting business in 1978. AIS is a wholly-owned subsidiary of the American Institute for Economic Research ("AIER"), a not-for-profit organization, and is governed by a Board of Directors appointed by AIER's Trustees. AIER established AIS to manage certain trust assets contributed to AIER and to provide investment advice and information to public investors that is consistent with AIER's mission, research findings and methodology.

#### AIS Board of Directors

Neil D. Holden, DBA, Chair  
Roy Bouffard, CFP  
Nelson E. Furlano, CPA  
Gerald E. Sohan, PhD  
Gregory van Kipnis

#### AIS Mission Statement

AIS provides investment services and publications based on portfolio diversification, discipline, and cost effectiveness consistent with the scientific research findings of AIER. AIS serves the interests of individuals and organizations through these investment services and the sale of investment publications and seeks to maximize shareholder wealth by acting in the best interests of clients and readers.

AIS carries out this mission by providing individuals, corporations and institutional investors with investment management and advisory services and through the sale of a monthly newsletter, the Investment Guide ("IG").

#### AIS Staff

John L. Barry, President, CEO and Chief Compliance Officer  
Luke F. Delorme, Director of Financial Planning  
Amanda Gershon, Director of Operations  
Seth L. Hoffman, Executive Vice President and Director of Individual Client Services  
Charles D. Murphy, Vice President and Chief Financial Officer  
David F. St. Peter, CFA, Vice President, Dir. of Institutional Services and Corp. Secretary  
Tricia Storti, Client Services Administrator  
Matthew J. Svirida, Vice President  
Mackenzie W. Waggaman, Vice President

AIS offers services on a non-exclusive basis. AIS seeks to avoid situations where one client's interests may conflict with the interests of other clients or the interests of AIS.

All clients and prospective clients should be aware of the following with respect to AIS and AIS's parent, AIER:

- AIER, through trusts established under its charitable giving programs, is AIS's largest advisory client;
- AIS may manage investment accounts for AIS's Directors, Employees and AIER Trustees;
- The AIS Board of Directors approves the compensation of AIS employees; and
- The AIS Board of Directors declares any dividends paid to AIER, as sole shareholder of AIS.

If any of the relationships described above give rise to a conflict of interest, AIS intends to put the interests of its other clients (those clients not referenced above) first and to make prompt disclosure of the conflict to all affected parties.

## **PORTFOLIO MANAGEMENT, SUPERVISION AND ADVICE**

AIS is a fee-only Registered Investment Adviser. The investment approach underlying AIS's investment services and publications can be characterized as structured, passive, asset allocation. This approach to investment management is based on the major tenets of Modern Portfolio Theory ("MPT") and holds that capital markets are highly efficient at pricing securities and that investors are rewarded with return for accepting risk. Investment allocations regarding our portfolio management services are based on our understanding of client objectives and needs. Clients may impose restrictions on investing in specific company securities, industries or types of financial products. See Item 16 Investment Discretion for more information.

Investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Securities of foreign issuers
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable annuities
- Mutual fund shares
- United States governmental securities

Because some types of investments involve certain additional degrees of risk, they will only be implemented when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

AIS investment management and advisory services for clients include:

- The Professional Asset Management program
- The Professional Asset Management and Financial Planning program
- The High-Yield Dow program
- The Portfolio Allocation Service
- Retirement Plan Services

### **Professional Asset Management (“PAM”)**

PAM is a discretionary investment management service for an entire portfolio. This service is designed for clients who embrace structured low-cost, personalized asset management. Under PAM the client authorizes AIS to make and implement investment decisions with respect to a specified portfolio that is designed in consultation with client. The service can include self-directed 401k plan assets on a discretionary basis if the plan permits, or on a supervisory basis if it does not. AIS also offers clients PAM with financial planning services on an optional basis for an additional fee.

PAM is generally open to all investors, though AIS generally requires a minimum investment of \$100,000 for new clients. However, it is designed for clients with investable assets of \$300,000 or more. This account size may be negotiable under certain circumstances. AIS may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Generally, PAM clients receive the following:

- Development and implementation of a client specific investment plan, based on the advisor’s understanding of the client’s unique circumstances and needs. Plans are updated as needed when the client circumstances change. This investment plan will include a recommendation for liquidation of existing securities (taking into account tax and other consequences);
- Quarterly reports, which include portfolio holdings by asset class and total returns versus appropriate benchmarks (from inception and for various time periods);
- Portfolio reviews, no less frequently than once per calendar quarter, to include portfolio rebalancing if warranted; and
- Access to mutual fund products from Dimensional Fund Advisors (“DFA”), which are not available to retail investors and are only available through selected DFA-approved advisors.

## **Professional Asset Management with Financial Planning (“PAM FP”)**

The PAM FP service includes all services included in our PAM service. In addition, the client will receive financial planning and consulting. This includes a review of the client’s overall financial circumstances at the inception of service and on an ongoing basis. The advisor will discuss the client’s options, if appropriate, regarding taxation, retirement planning, insurance, endowment spending and business planning legacy concerns as well as other client-specific financial planning matters. A formal written financial plan may be prepared, depending on the client’s needs.

Financial Planning Services are also available on a stand-alone basis for individuals and institutions who are not in need of asset management services, but who desire guidance with regard financial planning.

## **High-Yield Dow (“HYD”)**

HYD is a discretionary investment management service designed to replicate the returns of a domestic large cap value model portfolio – the High-Yield Dow (“HYD”) model -- based on a research study conducted by AIER. The HYD model is generally fully invested in a subset of those stocks that comprise the Dow Jones Industrial Average (DJIA). The HYD model portfolio follows a rules-based “four for 18-month” strategy based on relative dividend yield. From time-to-time, the portfolio will include spin-offs of DJIA components or stocks that are no longer part of the DJIA and un-reinvested cash from dividends. Individual accounts will also hold adequate cash to cover brokerage costs, AIS management fees (if the client authorizes AIS to deduct fees) and client distribution needs.

HYD is generally open to all investors, though AIS generally recommends a minimum investment of \$150,000 of AUM for this service and reserves the right to determine if the service is appropriate for each individual. This account size may be negotiable under certain circumstances. AIS may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Generally, in addition to discretionary account management HYD clients receive the following:

- Quarterly reports, which include portfolio holdings by asset class and total returns versus appropriate benchmarks (from inception and for various time periods); and
- Monthly portfolio reviews and rebalancing to keep the portfolio in line with model target allocations.

## **Portfolio Allocation Service (“PAS”)**

PAS is a discretionary investment advisory service designed as a cost-effective solution for investors with a single account. An AIS adviser and the client will consult to select one of several “model portfolios” designed for investors with varying degrees of risk preference ranging from an aggressive, all-equity portfolio to a conservative, all fixed income portfolio.

PAS is generally open to all investors, though AIS generally recommends a minimum investment of \$50,000 of AUM for this service. This account size may be negotiable under certain circumstances.

Generally, PAS clients receive the following:

- Quarterly reports, which include portfolio holdings by asset class and total returns versus appropriate benchmarks (from inception and for various time periods);
- Portfolio reviews, no less frequently than once per calendar quarter, to include portfolio rebalancing if warranted; and
- Access to mutual fund products from Dimensional Fund Advisors (DFA), which are not available to retail investors and are only available through selected DFA-approved advisors.
- Financial planning and consulting. An advisor will review the client's overall financial circumstances at the inception of service and on an ongoing basis. The advisor will discuss the client's options, if appropriate, regarding taxation, retirement planning, insurance, and legacy concerns as well as other client-specific financial planning matters. A formal written financial plan may be prepared, depending on the client's needs.

## **Retirement Plan Consulting Services**

AIS serves as consultant to sponsors of qualified retirement plans. AIS provides recommendations regarding investment options and service providers such as custodians, third-party administrators and record keepers. Services may also include drafting a plan Investment Policy Statement, providing annual participant education and preparing reports to plan sponsors.

*Investment Policy Statement Preparation (hereinafter referred to as "IPS").* AIS will meet with the plan sponsor (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. AIS will then prepare a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.



*Selection of Investment Vehicles.* AIS assists plan sponsors in constructing appropriate asset allocation models. AIS will then review various mutual funds to determine which investments are appropriate to implement the Plan's IPS. The number of investments to be recommended will be determined by the plan sponsor, based on the IPS.

*Monitoring of Investment Performance.* AIS monitors investment options for participants. Although AIS is not involved in any way in the purchase or sale of these investments, AIS evaluates the plan investment options and will make recommendations to the plan sponsor.

## **PUBLICATIONS**

AIS publishes the Investment Guide ("the IG"), a monthly newsletter. Each issue reports on developments in modern portfolio theory and implications for individual investors. Additional investment-related topics include taxation, financial planning and innovations in capital markets.

Four times a year a "Quarterly Review of Investment Policy" is presented in the IG with sample portfolio allocations based on hypothetical (non-investable) commercial indexes. These allocations are intended to demonstrate how individuals of varying risk profiles can construct portfolios tailored to their circumstances and preferences. Each monthly issue includes a recommended list of no-load, low-cost index type investment vehicles appropriate for each asset class. These vehicles are screened to meet AIS criteria with respect to expenses, turnover ratios, diversification and consistency in their ability to deliver the returns of their respective asset class.

Investment recommendations covering broad asset classes are provided in this newsletter, however, the information provided does not purport to meet the objectives or needs of any individual or provide personalized investment advice nor is supervision provided for subscribers.

## **AMOUNT OF MANAGED ASSETS**

As of January 31, 2016 AIS managed client assets totaling \$647,841 million.

### **Item 5 Fees and Compensation**

## **PORTFOLIO MANAGEMENT SERVICES FEES**

AIS provides investment services on a fee-only basis. The specific manner in which fees are charged is established in the client's written investment advisory agreement with AIS.

### **Professional Asset Management Fees**

AIS charges asset value based fees based upon a percentage of Assets Under Management ("AUM"). For PAM these fees generally range from 0.80% to 0.275% or a fixed, minimum annual fee (currently \$1,500), whichever is greater.

The annualized fee for PAM is charged generally according to the following schedule<sup>1</sup>:

Tier	Applies to AUM	Annual Fee
1	\$100,000 - \$250,000	0.80% of AUM or \$1,500, whichever is greater
2	\$250,001 - \$500,000	Tier 1 maximum fee plus 0.65% of AUM in Tier 2
3	\$500,001 - \$10,000,000	Tier 2 maximum fee plus 0.40% of AUM in Tier 3
4	\$10,000,001 - \$20,000,000	Tier 3 maximum fee plus 0.25% of AUM in Tier 4
5	\$20,000,001 - \$150,000,000	Flat 0.275% of total AUM
6	Over \$150,000,000	Tier 5 maximum plus 0.15% of AUM in Tier 6

### Professional Asset Management FP Fees

AIS charges asset value based fees based upon a percentage of Assets Under Management ("AUM"). For PAM FP these fees generally range from 1.00% to 0.425% or a fixed, minimum annual fee (currently \$1,500), whichever is greater.

The annualized fee for PAM FP is charged generally according to the following schedule:

Tier	Applies to AUM	Annual Fee
1	\$100,000 - \$250,000	1.00% of AUM, or \$1,500 whichever is greater
2	\$250,001 - \$500,000	Tier 1 maximum fee plus 0.85% of AUM in Tier 2
3	\$500,001 - \$10,000,000	Tier 2 maximum fee plus 0.575% of AUM in Tier 3
4	\$10,000,001 - \$20,000,000	Tier 3 maximum fee plus 0.40% of AUM in Tier 4
5	\$20,000,001 - \$150,000,000	Flat 0.425% of total AUM
6	Over \$150,000,000	Tier 5 maximum fee plus 0.20% of AUM in Tier 6

### HYD Fees

AIS charges asset value based fees based upon a percentage of AUM. For HYD these fees generally range from 0.70% to 0.275%, or a fixed, minimum annual fee (currently \$1,350), whichever is greater.

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<sup>1</sup> For clients who executed an advisory agreement with AIS prior to January 20, 2015, an alternative fee schedule applies.

The annualized fee for HYD is charged generally according to the following schedule:

<b>Tier</b>	<b>Applies to AUM</b>	<b>Annual Fee</b>
1	\$100,000 - \$250,000	0.70% of AUM or \$1,350, whichever is greater
2	\$250,001 - \$500,000	Tier 1 maximum fee plus 0.40% of AUM in Tier 2
3	\$500,001 - \$1,000,000	Tier 2 maximum fee plus 0.25% of AUM in Tier 3
4	\$1,000,001 - 1,500,000	Tier 3 maximum fee plus 0.10% of AUM in Tier 4
5	\$1,500,001 - \$12,500,000	Tier 4 maximum fee plus 0.30% of AUM in Tier 5
6	\$12,500,001 - \$30,000,000	Tier 5 maximum fee plus 0.25% of AUM in Tier 6
7	\$30,000,001 - \$175,000,000	Tier 6 maximum fee plus 0.275 of AUM in Tier 7
8	\$175,000,001 - Above	Tier 7 maximum fee plus 0.150% of AUM in Tier 8

### **PAS Fees**

The PAS management fee is a flat 0.75% of AUM with a minimum of \$1,000.

### **Retirement Plan Consulting Services Fees**

Fees for Retirement Plan Consulting Services are based on a percentage of plan assets per the PAM fee schedule in effect at the time the client executed an advisory agreement with AIS.

### **Financial Planning and Consulting Services Fees**

Stand-alone financial planning services are provided at an hourly rate and are negotiable depending on the nature of the engagement.

### **Publication Cost**

The present cost of a monthly Investment Guide subscription is \$59/year for print and \$49/year for electronic delivery. AIS may offer discounted subscription offers from time to time.

The annual subscription fee is waived for all AIS advisory clients. AIS may offer free or discount promotional subscriptions from time to time as part of its marketing efforts.

## **GENERAL INFORMATION**

*Portfolio Management Service Fees.* Fees are calculated and billed quarterly in arrears following the end of each calendar quarter. To calculate the fee due, AUM is calculated as of the close of business on the last day of the calendar quarter being billed. The initial date for calculating AUM is the date on which the assets are available for trading in the managed account. If services rendered by AIS commence on a day other than the first day of the calendar quarter or terminate other than on the last day of the calendar quarter, the fee is pro-rated. Fees for partial quarters will be prorated based on the number of days during the calendar quarter during which the account agreement was in effect. Fees are prorated for any significant capital contribution made into a managed account following the initial establishment of the account during the applicable calendar quarter.

*Termination of the Advisory Relationship.* A client agreement may be canceled at any time, by either party, for any reason upon receipt of ten (10) days written notice.

Upon termination of any account, any earned fees will be immediately due and payable. Any fees due to AIS shall be prorated to the date of termination and billed accordingly. Any prepaid, unearned fees will be pro-rated and then will be promptly refunded. AIS guarantees to refund, on a pro-rata basis, any prepayment for services canceled and not yet provided to clients or subscribers.

*Mutual Fund Fees.* All fees paid to AIS for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or 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. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by AIS which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and AIS's fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

*Non-Participation in Wrap Fee Programs and Separately Managed Account Fees.* As a matter of firm policy, AIS does not sponsor any wrap fee programs.

*Additional Fees and Expenses.* In addition to AIS advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

*Grandfathering of Minimum Account Requirements.* Advisory clients are subject to minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, AIS's minimum account requirements and

advisory fee schedules may differ among clients.

*ERISA Accounts.* AIS is deemed to be a fiduciary to advisory clients that are employee benefit plans or certain individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986. As such, AIS 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.

*Advisory Fees in General.* Clients should be aware that equivalent advisory services may be available from other investment advisers for similar fees.

*Limited Prepayment of Fees.* Under no circumstances does AIS require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

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

AIS does not charge performance-based fees, nor does it provide side-by-side management arrangements.

## **Item 7 Types of Clients**

AIS generally provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals);
- High net worth individuals;
- Pension and profit sharing plans;
- Charitable organizations;
- Corporations or other businesses not listed above.

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

### **Generally**

AIS's investment strategy is based on a wide body of empirical academic research and historical market data that embodies the major tenets of Modern Portfolio Theory ("MPT"), as articulated by the work of Harry Markowitz (the Capital Asset Pricing Model), Eugene Fama, Sr. (Efficient Market Hypothesis), Fama and Kenneth French (three-factor regression), and William Sharpe (the Arithmetic of Active Management), among others. AIS also incorporates research based on the work of AIER founder, E.C. Harwood, pertaining to monetary theory, inflation, and gold-related assets as an alternative to fiat currency.

AIS's approach to the capital markets relies on several key principles:

- Markets are efficient. Companies compete with each other for investment capital and investors compete for attractive returns. This competition quickly drives prices to fair value in the “collective judgment” of all market participants, and ensures that no investor can consistently expect greater return without bearing greater risk.
- All investors, in the aggregate, can expect the market rate of return less expenses.
- Idiosyncratic risk, or the risks posed by holding individual stocks or sectors, can be diversified away through comprehensive global portfolio diversification. Systemic risk cannot be diversified away. Therefore investors willing to accept more systemic risk expect to be rewarded with prospects for higher return. Investors can mitigate this risk by adding more stable assets such as short-term bonds and cash.
- Equity returns can be explained by exposure three risk factors – the risk of the market (or Beta), exposure to small capitalization stocks and exposure to value stocks (measured by book-to-market or dividend yield). “Tilting” an “all-market” portfolio toward either of the other two factors will increase expected returns.
- The returns on fixed income securities or a portfolio of fixed income securities, is highly dependent on a portfolio's exposure to term and credit risk.
- Gold represents a form of money that cannot be debased. In times of extreme financial disruption, gold can provide a form of portfolio insurance.

These principles demonstrate that in a globally diversified portfolio, asset allocation decisions and portfolio structure, rather than market timing or individual stock selection determine portfolio returns. Within this framework the most important factors that determine success are an appropriate understanding of investor's risk preference and the control of all investment-related costs (i.e., expenses and taxes).

### **Sources of Information**

AIS relies heavily on information provided by clients pertaining to their financial situation, investment objectives, time horizon, liquidity requirements, tax sensitivity, estate plans and other factors. This information forms the foundation of an asset allocation plan designed to meet each client's goals and is formalized in an Investment Policy Statement (“IPS”). The IPS is a communication tool that is revised as the clients' circumstances and objectives change.

AIS relies on internal research, and on research provided in collaboration with financial economists employed by AIER. AIS also employs commercially available software (such as Morningstar, Bloomberg and Haver Analytics), securities rating services and other public sources of information.

AIS also receives research and consulting services from Dimensional Fund Advisors (“DFA”), Vanguard, iShares, and State Street Global Advisors. DFA provides historical market data and computer programs. AIS uses this information to model historical and expected returns – and to conduct probabilistic forecasting (i.e., Monte Carlo simulation).

## **Types of Investments**

AIS generally builds portfolios of no-load equity and bond mutual funds and ETFs. AIS typically recommends passively managed funds managed by DFA, iShares and Vanguard. These funds provide broad diversification and low turnover which reduces fund management expenses incurred by fund shareholders.

In larger accounts, AIS may utilize the High-Yield Dow investment strategy (i.e., individual U.S. large-cap value securities), individual Real Estate Investment Trust (REIT) securities, individual utility securities, and individual fixed income instruments. AIS also takes positions in gold bullion-backed exchange traded funds on behalf of its clients.

Portfolios may also include individual equity or fixed income securities that are not included in any of the strategies described. These are exceptions and are usually “legacy” positions that a client may have purchased prior to working with AIS. They may be held because of tax considerations, or for other client-specific reasons.

AIS will generally develop a plan in consultation with the client for the liquidation of non-recommended positions. If a client wishes to maintain non-recommended securities and not include them in their portfolio plan AIS may, after discussion with the client, exclude them from the management fee and performance calculations. In such situations, AIS reports will clearly state that the positions are “unsupervised” and that AIS is not responsible for their management.

401k plan investment options vary widely from plan to plan and are determined by plan sponsors. Investments available may therefore not be what AIS would select absent those limitations. AIS will review investment options for client self-directed 401k assets and make recommendations that are determined to best meet the client’s individual situation.

AIS will also review existing variable annuities for prospective clients and may recommend that clients transfer their existing annuities to low-cost, no-load variable or fixed annuities when appropriate. If appropriate AIS will manage these annuities as part of the client’s overall asset allocation plans.

## **Risk of Loss, Generally**

Investing in securities involves a risk of loss that clients should be prepared to bear. Risk is the measurement of the degree of unpredictability of a given portfolio’s return in any given period. All investment programs carry the risk of loss, and there is no guarantee that any recommended investment strategy will meet its objectives. Even the

most conservative investment strategy is subject to risk. Investment recommendations seek to limit risk through global diversification both within and across asset classes, including global and fixed income securities.

Diversification can minimize portfolio volatility, but will not eliminate the possibility of declines in portfolio values, which can be severe at times. AIS believes that investors will be rewarded with higher expected returns (relative to the entire market) by increasing exposure to the risks inherent in small cap and value stocks. Additionally, an allocation to gold-related assets has provided portfolio protection in times of extreme market instability.

### **Specific Types of Risk**

*Market Risk.* Market risk, also known as systematic risk, is the risk inherent to the entire market or an entire market segment. For example, interest rates, recession, natural disasters and wars all represent sources of systematic market risk that cannot be avoided through market diversification. Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities, and the funds that own them, to rise or fall. The value of even a well-diversified portfolio will fluctuate, and there is a risk that investors will lose money.

*Foreign Securities and Currencies Risk.* Foreign securities prices may decline or fluctuate because of: (a) economic or political actions of foreign governments, and/or (b) less regulated or less liquid securities markets. Investors holding these securities may also be exposed to foreign currency risk (the possibility that foreign currency will fluctuate in value against the U.S. dollar).

*Small Company Risk.* Securities of small companies are often less liquid than those of large companies which can make it difficult to execute trades in a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, smaller capitalization companies are also more vulnerable than larger companies to adverse business or economic developments as they may have more limited resources.

*Value Investment Risk.* Value stocks may perform differently from the market as a whole. Following a value-oriented investment strategy may cause the Portfolio to, at times, underperform equity funds that use other investment strategies. This risk may be more pronounced within the high-yield Dow strategy, which is less diversified than most large cap value indexing strategies.

*Emerging Markets Risk.* Numerous emerging market countries have a history of, and continue to experience, economic and political disruption. Stock markets in many emerging market countries are relatively small, expensive to trade in, and risky. Foreigners are often limited in their ability to invest in, and withdraw assets from these markets. Additional restrictions may be imposed under other conditions. Frontier market countries generally have smaller economies or less developed capital markets. As a result, the risks of investing in emerging market countries are magnified in frontier market countries.

*Derivatives.* Derivatives are securities, such as futures contracts, whose value is



derived from that of other securities or indices. Derivatives can be used for hedging (attempting to reduce risk by offsetting one investment position with another) or non-hedging purposes. Derivative securities are subject to a number of risks including liquidity, interest rate, market, credit and management risks, and the risk of improper valuation.

*Securities Lending.* Securities lending involves the risk that the borrower may fail to return the lender's securities, or fail to do so in a timely manner. As a result, mutual funds which lend securities may lose money and there may be a delay in recovering the loaned securities.

*Interest Rate Risk.* Fixed income securities are subject to interest rate risk because the prices of fixed income securities tend to move in the opposite direction of interest rates. When interest rates rise, fixed income security prices fall. When interest rates fall, fixed income security prices rise. In general, fixed income securities with longer maturities are more sensitive to these price changes versus fixed income securities with shorter maturities.

*Credit Risk.* Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value, and thus, impact fixed income performance.

*Inflation Risk.* To the extent that cash balances are maintained, assets may be subject to the risk of inflation and loss of purchasing power when adjusted for inflation.

## **Item 9    Disciplinary Information**

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

AIS and AIS management personnel have no reportable disciplinary events to disclose.

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

AIS and AIS related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

AIS has adopted a Code of Ethics (the "Code") which sets forth high ethical standards of business conduct that AIS requires of employees, including compliance with applicable Federal and State regulations governing registered investment advisory practices. The Code is designed to assure that the personal securities transactions, activities and interests of AIS's employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the

same time, allowing employees to invest for their own accounts.

AIS and AIS personnel owe a duty of loyalty, fairness and good faith towards 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. AIS has established policies requiring AIS supervised persons' reporting Code violations to senior management or an alternate designee, and possible sanctions for Code violations include suspension or termination of employment. Annually, AIS delivers the Code to each supervised person and requires an attestation of understanding and compliance with the Code by each such supervised person. The Code requires that anyone associated with the advisory practice who possesses access to advisory recommendations ("access persons") provide initial and annual securities holdings reports and quarterly transaction reports to AIS's Chief Compliance Officer or an alternate designee.

The Code allows individuals associated with AIS to buy or sell for their personal accounts the same securities as AIS purchases for or recommends to clients. However, it is the expressed policy that no person employed by AIS shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

The Code of Ethics also details AIS's policy prohibiting the use of material non-public information and the confidentiality of client information. While AIS does not believe that it has any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity. As such, no Principal, or employee of AIS may buy or sell securities where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.

AIS does not participate in securities in which it has a material financial interest. AIS and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which AIS or its related persons has a material financial interest.

AIS and individuals associated with AIS are prohibited from engaging in principal transactions and are prohibited from engaging in agency cross transactions.

AIS requires prior approval for any IPO or private placement investments by related persons of AIS.

The code also provides for oversight, enforcement and recordkeeping provisions. AIS has established procedures for the maintenance of all required books and records.

A copy of the AIS Code of Ethics is available to advisory clients and prospective clients by request to [AisInfo@americaninvestment.com](mailto:AisInfo@americaninvestment.com), or by calling 888-528-1216.

## **Item 12 Brokerage Practices**

Prior to engaging AIS to provide discretionary investment management and supervisory services, clients will be required to execute an Investment Advisory Agreement with AIS setting forth the terms and conditions under which AIS shall manage the client's assets and a separate custodial/clearing agreement with designated broker-dealer/custodians.

AIS generally requires investment discretion, and will only place trades through one or more broker-dealers selected by the client. In the case of 401k plan accounts which do not permit discretionary management by a third party, AIS will provide continuous account supervision and make specific trade recommendations the client. See Item 16 for further information regarding Investment Discretion.

As a matter of policy and practice, AIS does not generally block client trades and, therefore, implements client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, AIS clients may not receive volume discounts available to advisers who block client trades.

### **AIS Custodians and Brokers**

AIS does not maintain custody of client assets that we manage or advise. Client assets must be maintained in accounts at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), TD Ameritrade Institutional, or National Financial Services LLC/Fidelity Brokerage Services LLC (Fidelity) as the qualified custodian(s) (collectively "custodian/brokers"). These firms are each FINRA registered broker-dealers and members of SIPC. Although AIS recommends that clients establish accounts with one or more of these custodian/brokers, the selection is ultimately the client's decision. The client will enter into an account agreement directly with their chosen custodian. We do not open the account, although we may assist clients in doing so.

AIS is independently operated and is not affiliated with Schwab, TD Ameritrade or Fidelity.

### **How AIS Selects Brokers/Custodians**

AIS seeks to recommend custodian/brokers that will hold client assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for client accounts)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, ACH payments, etc.)

- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.), including no-load products
- Quality of services
- Competitiveness of price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to AIS and our clients
- Availability of other products and services that benefit us, as discussed below.

The recommended custodian/brokers generally do not charge separately for custody services. They are compensated by charging clients commissions and other fees on trades that they execute. We have determined that having Schwab, TD Ameritrade and Fidelity execute most trades is consistent with our duty to seek “best execution” of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors including those listed above.

### **Products and Services Available to AIS from Schwab, TD Ameritrade and Fidelity**

Schwab, TD Ameritrade and Fidelity provide AIS and our clients with access to institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to retail customers. These custodian/brokers also make various support services available to AIS to help us manage or administer our clients’ accounts and to help us manage and grow our business. These support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of such support services:

**Services that benefit clients.** Institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available include some to which we might not otherwise have access, or that would require a significantly higher initial investment by our clients.

**Services that may not directly benefit clients.** Custodian/Brokers also make available to AIS other products and services that benefit AIS but may not directly benefit clients or their accounts. These products and services assist us in managing and administering out clients’ accounts. They include investment research. We may use this research to service all or a substantial number of our clients’ accounts. In addition to investment research, software and other technologies are made available that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)

- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping and client reporting

**Services that generally benefit only AIS.** Custodian/brokers offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management

The availability of these services from Schwab, TD Ameritrade and Fidelity benefits AIS because we do not have to produce or purchase them. AIS does not have to pay for these services. We may have an incentive to request that clients maintain accounts with a custodian based on our interest in receiving services that benefit our business rather than based on clients' interests in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab, TD Ameritrade and Fidelity as custodians and brokers is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of services (see "How AIS Selects Brokers/Custodians") and not services that benefit only AIS.

## **Item 13 Review of Accounts**

**Rebalancing Accounts Generally (PAM, HYD and PAS Services).** Account reviews are performed by AIS advisers no less than quarterly to determine if asset class values have deviated from desired targets or target ranges and for the purpose of meeting clients' cash flow needs. Even if one or more asset classes fall outside their target, the advisor may determine not to rebalance the asset class for various reasons, such as avoidance of short-term capital gains, deferring long-term capital gains, minimizing transaction costs, or for various other reasons.

Additional portfolio reviews are undertaken upon request by clients, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. AIS will respond to such requests promptly.

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

circumstances. AIS may also execute sales and purchases for tax loss harvesting.

In executing rebalancing actions, the portfolio manager will seek to rebalance one or more asset classes closer to the targets, but may choose not to rebalance a specific asset class or security in light of tax considerations, transaction costs relative to the trade amount or for other reasons. AIS may estimate the market close at any point during the day during which trades are placed and undertake trades on that basis.

**Reports.** Generally, PAM, HYD and PAS clients receive quarterly reports, which include portfolio holdings by asset class and total returns versus appropriate benchmarks (from inception and for various time periods).

**Rebalancing for HYD Accounts and HYD Holdings within PAM Accounts.** AIS's high-yield Dow model portfolio is calculated monthly based on mid-month closing prices. HYD accounts are rebalanced the following day in order to bring the holdings back in line with the percentage value of each holding in the model portfolio. AIS will generally not place rebalancing trades if the transaction cost is more than one-percent of the value of the trade.

For PAM accounts that hold a portion of the large-cap value segment of the portfolio in the high yield Dow model, AIS will generally make rebalancing trades monthly based on the mid-month calculation.

## **Retirement Plan Consulting Services**

**Reviews.** AIS advisers will review the Plan's Investment Policy Statement (IPS) whenever the Plan Sponsor advises AIS of a change in circumstances regarding the needs of the plan. AIS will also review the investment options of the plan. Such reviews are generally conducted no less than annually.

**Reports.** Plan participants receive statements from the record keeper of the Plan.

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

It is AIS's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to AIS.

It is AIS's policy not to accept or allow AIS 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 AIS provides to clients.

## **Item 15 Custody**

AIS previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that advisory fees are directly debited from many client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. 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.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact AIS directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, AIS also sends account statements directly to clients on a quarterly basis. AIS urges all clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

AIS does not have actual or constructive custody of client accounts.

## **Item 16 Investment Discretion**

Clients hire AIS to provide discretionary asset management services and, as such, AIS places trades in client accounts without contacting the client prior to each trade to obtain the client's permission.

AIS's discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

AIS requests written authority in the form of a limited power of attorney to trade in clients' accounts. This allows AIS to determine which securities to sell and in what amounts without consultation with the client on a transaction-by-transaction basis. However, the client may place conditions including restrictions on transactions in specific company securities or industries or types of financial products. These conditions should be communicated to AIS in writing. Clients may also change/amend such limitations by providing AIS with written instructions.

In self-directed 401(k) accounts where the plan does not permit discretionary management by a third party, AIS will provide continuous account supervision and make specific trade recommendations to the client.

## **Item 17 Voting Client Securities**

AIS votes proxies for client accounts with written, delegated authority from the client. Clients always have the right to decline delegating proxy voting authority to AIS, and may rescind previously granted authority upon written notice. Clients can instruct AIS to vote proxies according to particular criteria, however, these requests must be made in writing. AIS will vote proxies in the best interest of the client and in accordance with established policies and procedures.

The following is a summary of the AIS Proxy Voting Policies:

- With delegated authority from the client, AIS will generally vote all proxies for client securities;
- AIS will refrain from voting if a matter covered by a proxy represents a material conflict of interest with the client(s) owning the securities, unless instructed how to vote by the client(s);
- AIS will refrain from voting if it deems non-voting to be in the best interests of clients;
- AIS will vote proxies in accordance with general or specific instructions or guidelines provided by clients; and
- In the absence of client instructions or guidelines, AIS will vote proxies so as to maximize the economic value of the client securities and serve the best interests of clients.

The following is a summary of the AIS Proxy Voting Procedures:

- AIS will monitor actions of corporations whose securities are held in client accounts;
- AIS will ensure action is taken on each proxy by the proxy voting deadline; and
- AIS will identify whether a material conflict of interest exists between AIS and client(s).

AIS will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by AIS that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. Clients may request, in writing, information on how proxies for his/her shares were voted.

AIS 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), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct AIS in writing to transmit copies of class action notices to the client or a third party. Upon such written direction, AIS will make commercially reasonable efforts to forward such notices in a timely manner.

## **Item 18 Financial Information**

As an advisory firm that maintains discretionary authority for client accounts, AIS is also required to disclose any financial condition that is reasonably likely to impair AIS's ability to meet all contractual obligations. AIS has no such financial circumstances to report.



Under no circumstances does AIS require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, AIS is not required to include a financial statement.

AIS has not been the subject of a bankruptcy petition at any time during the past ten years.



**Part 2B of Form ADV: *Brochure Supplement***

John L. Barry, ChFC  
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American Investment Services, Inc.  
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March 30, 2015

This brochure supplement provides information about John L. Barry ChFC that supplements the American Investment Services, Inc. brochure. You should have received a copy of that brochure. Please contact Mr. Barry at 413-528-1216, ext. 3119 if you have any questions about the contents of this supplement.

Additional information about John L. Barry ChFC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



**John L. Barry, ChFC, President, Chief Executive Officer, Chief Compliance Officer**

Mr. Barry is responsible for strategic planning and for the overall direction of the firm. He is closely involved in investment strategy and serves as editor-in-chief of the *Investment Guide*.

John's duties include overseeing portfolio strategy, new business development and producing the monthly newsletter, *Investment Guide*. He plays a key role in monitoring developments in Modern Portfolio Theory and in guiding staff to ensure that useful advances in financial theory are adopted in practice.

John is an avid runner and Nordic skier and enjoys fishing and spending time with his wife and three children.

**Item 2 Educational Background and Business Experience**

**Full Legal Name:** John L. Barry ChFC      **Born:** 1962

**Education** - John graduated with a BBA in finance from Notre Dame in 1984. He received an MA in Economics from the University of California Santa Barbara in 1991 and an MBA from the University of Montana in 1988

**Business Experience** - John served for eight years as a junior officer in the U.S. Air Force, attaining the rank of Captain; in his final duty assignment he taught undergraduate economics at the U.S. Air Force Academy. He left the service to work as an analyst for Prudential Insurance before joining AIS in 1994. He became President and CEO in 2000

**Designations** - John L. Barry ChFC has earned the following designation(s) and is in good standing with the granting authority:

- Chartered Financial Consultant®; American College; 1999
- The ChFC® program is administered by the American College. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. In addition to successful completion of an exam on areas of financial planning, including income tax, insurance, investment and estate planning, candidates are required to have a minimum of three (3) years experience in a financial industry position.

### **Item 3 Disciplinary Information**

John L. Barry ChFC has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

1. John L. Barry ChFC is not engaged in any other investment-related activities.
2. John L. Barry ChFC does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

John L. Barry ChFC is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

John L. Barry ChFC does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** Neil D. Holden  
**Title:** Chairman, AIS Board of Directors  
**Phone Number:** 413 528 1216

AIS Board of Directors is responsible for supervising the activities of John L. Barry.



**Part 2B of Form ADV: *Brochure Supplement***

Seth L. Hoffman  
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March 30, 2015

This brochure supplement provides information about Seth L. Hoffman that supplements the American Investment Services, Inc. brochure. You should have received a copy of that brochure. Please contact Christine Weaver 413-528-1216, ext. 3122 if you did not receive American Investment Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Seth L. Hoffman is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



**Seth L. Hoffman, Executive Vice President and Director of Individual Client Services**

Mr. Hoffman is a portfolio manager, contributes articles regularly to the *Investment Guide* and is involved in the investment research and portfolio design process and the firm's business development strategy.

Seth completed the global management associate program at American International Group (AIG) and held various positions of increasing responsibility at AIG prior to joining AIS in January of 2003. Seth lives in Richmond, Massachusetts with his wife and two children.

**Item 2 Educational Background and Business Experience**

**Full Legal Name:** Seth L. Hoffman      **Born:** 1967

**Education** - Seth graduated with a BA in international studies from Vassar College in 1990. He received an MBA in international management from Thunderbird School of International Management in 1996. He has also completed coursework at Columbia University and the University of Granada in Granada, Spain.

**Business Experience** - Seth joined AIS in 2003 as a senior analyst and portfolio manager. He became administrative vice president in 2005, chief compliance officer in 2008 and executive vice president in 2010. He held various positions with the American International Group (AIG) from 1998 to 2002.

### **Item 3 Disciplinary Information**

Seth L. Hoffman has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

1. Seth L. Hoffman is not engaged in any other investment-related activities.

2. Seth L. Hoffman does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

Seth L. Hoffman is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

Seth L. Hoffman does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** John Barry

**Title:** President and CEO

**Phone Number:** 413-528-1216, ext. 3119

John L. Barry as CEO is responsible for providing supervisory oversight over all AIS employees to ensure the fair and ethical conduct of AIS's advisory services.



**Part 2B of Form ADV: *Brochure Supplement***

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March 30, 2015

This brochure supplement provides information about Charles D. Murphy that supplements the American Investment Services, Inc. brochure. You should have received a copy of that brochure. Please contact Christine Weaver 413-528-1216, ext. 3122 if you did not receive American Investment Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Charles D. Murphy is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)





**Charles D. Murphy, Vice President and Chief Financial Officer**

Mr. Murphy is a portfolio manager and is also responsible for accounting operations including preparation of quarterly and annual financial statements. Charles is also actively involved in marketing and the design and promotion of the *Investment Guide*.

Charles has over twenty years of experience in the financial services industry in investment management and accounting. Charles also proudly served in the United States Navy during Operations Desert Shield and Desert Storm. He lives in Pittsfield, Massachusetts with his wife and two children.

**Item 2 Educational Background and Business Experience**

**Full Legal Name:** Charles D. Murphy      **Born:** 1970

**Education** - Charles graduated with a BBA in Accounting from Loyola University at Baltimore in 1997.

**Business Experience** - Charles began working with AIS in 2007, and has been Vice President and Chief Financial Officer of AIS since 2009. Prior to joining AIS, Charles was a Financial Advisor with Merrill Lynch, Pierce, Fenner, and Smith, and served as Vice President, Controller and Financial Advisor for Dion Money Management in Williamstown, MA.

**Item 3 Disciplinary Information**

Charles D. Murphy has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Charles D. Murphy is not engaged in any other investment-related activities.

2. Charles D. Murphy does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Charles D. Murphy is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5 Additional Compensation**

Charles D. Murphy does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** John L. Barry

**Title:** President and CEO

**Phone Number:** 413-528-1216, ext. 3119

John L. Barry as CEO is responsible for providing supervisory oversight over all AIS employees to ensure the fair and ethical conduct of AIS's advisory services.



**Part 2B of Form ADV: *Brochure Supplement***

David F. St. Peter CFA  
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March 30, 2015

This brochure supplement provides information about David F. St. Peter CFA that supplements the American Investment Services, Inc. brochure. You should have received a copy of that brochure. Please contact Christine Weaver 413-528-1216, ext. 3122 if you did not receive American Investment Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about David F. St. Peter CFA is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



**David F. St. Peter, CFA, Vice President, Director of Institutional Services**

Mr. St. Peter joined AIS in 2008, is a portfolio manager and is responsible for institutional accounts. He is also involved in portfolio research and business operations. David serves as Corporate Secretary of AIS.

David has over 15 years of experience in finance and investment management. He received his CFA (Chartered Financial Analyst) designation in 2000. David lives in Stockbridge, Massachusetts with his wife and three sons.

**Item 2 Educational Background and Business Experience**

**Full Legal Name:** David F. St. Peter, CFA      **Born:** 1973

**Education** - David graduated with a BA in Biology from Harvard in 1995. He received an MBA in Finance from Columbia Business School in 2002.

**Business Experience** - Prior to joining AIS, David managed an equity portfolio using a proprietary stock screening and trading model. He previously worked as a security analyst at Loomis, Sayles & Co. in Boston and was a financial analyst with Goldman, Sachs & Co. in New York City.

**Designations** - David F. St. Peter, CFA has earned the following designation and is in good standing with the granting authority:

- Chartered Financial Analyst®; CFA Institute; 2000  
This designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA® charter, candidates must successfully complete three exams and gain at least three (3) years of qualifying work experience, among other

requirements. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

### **Item 3 Disciplinary Information**

David F. St. Peter, CFA has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

1. David F. St. Peter, CFA is not engaged in any other investment-related activities.

2. David F. St. Peter, CFA does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

David F. St. Peter, CFA is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

David F. St. Peter CFA does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** John Barry

**Title:** President & CEO

**Phone Number:** 413-528-1216, ext. 3119

John L. Barry as CEO is responsible for providing supervisory oversight over all AIS employees to ensure the fair and ethical conduct of AIS's advisory services.



**Part 2B of Form ADV: *Brochure Supplement***

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March 30, 2015

This brochure supplement provides information about Matthew J. Svirida that supplements the American Investment Services, Inc. brochure. You should have received a copy of that brochure. Please contact Christine Weaver 413-528-1216, ext. 3122 if you did not receive American Investment Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew J. Svirida is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



**Matthew J. Svirida, Vice President**

Mr. Svirida joined AIS in 2005, is a portfolio manager and oversees equity trading.

Matthew is currently working towards his Certified Financial Planner (CFP) certification. He lives in Lee, MA with his wife and son, enjoys supporting his local community sponsored farm and has a wide variety of interests including swimming, biking, yoga, table tennis, guitar and cooking.

**Item 2 Educational Background and Business Experience**

**Full Legal Name:** Matthew J. Svirida      **Born:** 1969

**Education** - Matthew graduated with a BBA from Hofstra University in 1992 and has completed graduate coursework at Mercy College, New York.

**Business Experience** - Matthew has been employed in the financial services field since 1997. He previously worked for JP Morgan Chase in New York City where he held two positions during his time there. He worked as a Group Administrator with Personal Financial Services, an affluent investment sales group, and also held the position of Representative Liaison where he assisted and educated the 300+ financial advisors in the nationwide Chase Investment Services, Inc. network. Prior to his tenure with JP Morgan Chase, he was employed on the trading desk of two independent broker-dealers.

**Item 3 Disciplinary Information**

Matthew J. Svirida has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Matthew J. Svirida is not engaged in any other investment-related activities.

2. Matthew J. Svirida does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Matthew J. Svirida is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5 Additional Compensation**

Matthew J. Svirida does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** John L. Barry

**Title:** President and Chief Executive Officer ("CEO")

**Phone Number:** 413-528-1216, ext. 3119

John L. Barry as CEO is responsible for providing supervisory oversight over all AIS employees to ensure the fair and ethical conduct of AIS's advisory services.





**Part 2B of Form ADV: *Brochure Supplement***

Mackenzie W. Waggaman  
250 Division Street  
Great Barrington, MA 01230  
413-528-1216

American Investment Services, Inc.  
250 Division Street  
P.O. Box 1000  
Great Barrington, MA 01230

March 30, 2015

This brochure supplement provides information about Mackenzie W. Waggaman that supplements the American Investment Services, Inc. brochure. You should have received a copy of that brochure. Please contact Christine Weaver 413-528-1216, ext. 3122 if you did not receive American Investment Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Mackenzie W. Waggaman is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



**Mack W. Waggaman, Vice President**

Mr. Waggaman is a portfolio manager and contributes to the Investment Guide.

Mack returned to the Northeast in 1998 after a long and varied career as an executive in the motion picture and television industry during which he worked in both film and animation. Mack enjoys rowing and outdoor recreation. He has three adult children and lives in Mt. Washington, Massachusetts with his wife Judy.

**Item 2 Educational Background and Business Experience**

**Full Legal Name:** Mackenzie W. Waggaman

**Born:** 1950

**Education** - Mack received his BA from the Rochester Institute of Technology in 1975 and an MBA from the Rennsselaer Polytechnic Institute in 2003.

**Business Experience** - Prior to joining AIS in 2004, Mack was a financial consultant and broker for A.G. Edwards & Co. He previously worked in the motion picture and television industry where he held numerous executive positions, including Vice President and General Manager of Medialab Studio, L.A.

**Item 3 Disciplinary Information**

Mackenzie W. Waggaman has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Mackenzie W. Waggaman is not engaged in any other investment-related activities.

2. Mackenzie W. Waggaman does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Mackenzie W. Waggaman is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5 Additional Compensation**

Mackenzie W. Waggaman does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** John L. Barry

**Title:** President and Chief Executive Officer ("CEO")

**Phone Number:** 413-528-1216, ext. 3119

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