

Part 2A of Form ADV: *Firm Brochure*

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This brochure provides information about the qualifications and business practices of Pension Parameters Financial Services, Inc.. If you have any questions about the contents of this brochure, please contact us at 212/675-9360 or p.d.b401e@gmail.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Pension Parameters Financial Services, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 110405.

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 06/17/2011, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

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

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Item 4 Advisory Business

Pension Parameters Financial Services, Inc. is an SEC-registered investment adviser with its principal place of business located in New York. Pension Parameters Financial Services, Inc. began conducting business in 1991.

Listed below is the firm's principal shareholder (i.e., the individual controlling 25% or more of this company).

Kevin Mc Cormack, President

Pension Parameters Financial Services, Inc. offers the following advisory services to our clients:

RETIREMENT PLAN CONSULTING SERVICES

We provide advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts. Retirement Plan Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

Preparation of an Investment Policy Statement (hereinafter referred to as "IPS"):

We will meet with the client to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS that identifies the investment goals and objectives of the plan, sets out decision-making processes for selecting investments, and specifies the procedures and relevant measurement indexes to be used in assessing ongoing investment performance, in accordance with the stated investment objectives.

Selection of Investment Vehicles:

We offer guidance and recommendations to the client in the choice and retention of investment options. Through the institutional trading platform that we use, we offer no load and no transaction fee mutual funds (both index and managed).

Monitoring of Investment Performance:

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications:

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide annual educational support and opportunities to discuss mutual fund investment choices. The nature of the topics to be covered will be determined by us and the client under the guidelines

established in ERISA Section 404(c). The educational support and opportunities to discuss mutual fund investment choices provide plan participants with asset allocation recommendations.

Item 5 Fees and Compensation

RETIREMENT PLAN CONSULTING FEES

Our fees for Pension Consulting Services are usually directly debited from the client's accounts, and are based on a percentage of assets under advisement, according to the following schedule:

Tiered schedule ranging from .35% to 1.5% of Net Asset Value ("NAV")

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of **30** days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

Mutual Fund Fees: All fees paid to Pension Parameters Financial Services, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or Exchange Traded Funds ("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. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our 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.

ERISA Accounts: Pension Parameters Financial Services, Inc. is not deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income Security Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit prepayment of fees.

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

Pension Parameters Financial Services, Inc. does not charge performance-based fees.

Item 7 Types of Clients

Pension Parameters Financial Services, Inc. provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plan trustees (other than plan participants)

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Qualitative Analysis. We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund Analysis. We look at the experience and track record of the manager of the mutual fund in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Item 9 Disciplinary Information

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

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

No member of our firm's management is separately licensed as an investment adviser representative of **any other company**.

Pauline Dana-Bashian, a member of our firm's management, is an attorney licensed to practice law in the state of **New York**. However, this individual does not currently provide direct legal services to any client in that capacity and will not act in this capacity for any advisory client of Pension Parameters Financial Services, Inc..

Clients should be aware that the receipt of additional compensation by Pension Parameters Financial Services, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Pension Parameters Financial Services, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees; currently, no conflicts of interest exist;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- currently, no member of the management of Pension Parameters Financial Services, Inc. is engaged in any outside employment activities, but we continue to verify that fact and assure that any potential conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

As disclosed in the preceding section of this Brochure (Item 10), no related persons of our firm are separately registered as **securities and/or investment advisor representatives of another firm**. Please refer to Item 10 for important conflict of interest disclosures.

Item 12 Brokerage Practices

Pension Parameters Financial Services, Inc. has an arrangement with Matrix Settlement & Clearance Services, LLC ("MSCS") and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity and MSCS provide our firm with their "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Pension Parameters Financial Services, Inc. in conducting business and in serving the best interests of our clients but that may also benefit us.

Fidelity and MSCS charge brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are not charged for no load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity's and MSCS's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity and MSCS may be higher or lower than those charged by other custodians and broker-dealers. As part of the arrangement, Fidelity also makes available to our firm, at no additional charge to us, certain research and brokerage services, including research services obtained by

Fidelity directly through their Advisor Channel.

Item 13 Review of Accounts

RETIREMENT PLAN CONSULTING SERVICES

REVIEWS: Pension Parameters Financial Services, Inc. will review the client's Investment Policy Statement ("IPS") whenever the client advises us of a change in circumstances regarding the needs of the plan. Pension Parameters Financial Services, Inc. will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such in depth reviews will generally occur annually.

These accounts are reviewed monthly by a committee consisting of: Kevin Mc Cormack, President, Amelia Soto, Vice President, Marjorie Mantas, Certified Financial Planner and Pauline Dana-Bashian, Attorney and Chief Compliance Officer.

These client accounts will receive reports as contracted for at the inception of the advisory relationship on a quarterly basis.

Item 14 Client Referrals and Other Compensation

It is Pension Parameters Financial Services, Inc.'s policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Pension Parameters Financial Services, Inc.'s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from 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 us 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, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Our firm does not have actual or constructive custody of client accounts.

Item 16 Investment Discretion

As previously disclosed in Item 4 of this brochure, our firm does not provide discretionary asset management services; we manage client assets only on a non-discretionary basis. Therefore, we will obtain the client's approval before executing transactions in the client's account.

Item 17 Voting Client Securities

We do not offer any consulting assistance regarding proxy issues to clients.

Item 18 Financial Information

As an advisory firm that **does not maintain discretionary authority for client accounts**, we are nevertheless required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Pension Parameters Financial Services, Inc. has no additional financial circumstances to report.

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

Pension Parameters Financial Services, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.