

**Asset Solutions, Inc.
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This brochure provides information about the qualifications and business practices of Asset Solutions, Inc. If you have any questions about the contents of this Brochure, please contact us at (303) 932-2288 and/or office@assetsolutionsria.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 Asset Solutions, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Any references to Asset Solutions, Inc. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Material Changes

This is the initial disclosure brochure. Therefore, there are no material changes to disclose.

At least annually, this Item will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

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Advisory Business

Asset Solutions, Inc. (hereinafter referred to as “Asset Solutions”) is an investment advisory firm offering a variety of advisory services customized to your individual needs. The services are more fully described below.

Asset Solutions was established in 1998 and filed for investment adviser registration with the Securities and Exchange Commission in 2008. Mark Richey is the President and sole owner. Mark has been in the financial services industry for over 30 years. Additional business information about Mark Richey is disclosed on the Supplemental Brochure attached to this Brochure.

Asset Solutions has \$53,611, 981 of discretionary assets under management as of December 31, 2010.

Asset Solutions offers the following advisory services. Each of the services is more fully described below.

- Financial Planning Services
- Asset Management
- Analysis, Recommendation and Monitoring of Third Party Managed Programs
- Seminars and Speaking Engagements

Asset Solutions tailors the advisory services it offers to your individual needs. You cannot impose restrictions and/or limitations on the investing in certain securities or types of securities. Asset Solutions starts the process by meeting with you. The first meeting is an opportunity for you and Asset Solutions to determine if the relationship is a good fit. You will be provided a letter prior to the meeting requesting you bring to the first meeting the following:

- Bank and investment statements
- Statement of your current debts
- Most recent tax return
- Copies of your most recent paycheck stubs
- Retirement plan statements from your employer
- Any retirement plan estimates from PERA, FSRS, CSRS or any other defined benefit plans
- Insurance policies (auto, home, life, annuity, and disability)
- Wills and trust documents
- Amortization schedules for your home, rentals or land

Asset Solutions will ask you to complete a fact finder to assist Asset Solutions with obtaining information about your financial situation and history. Additionally, a risk profile questionnaire is completed. A second meeting will be scheduled to review your overall financial situation and Asset Solutions will present its analysis of your situation. A third meeting is scheduled where recommendations are presented. You should expect at least three to four meetings before implementation begins.

Asset Solutions employs the use of a financial planning and reporting program to assist with evaluating your financial situation.

Asset Solutions offers investment advice on all types of investments. However, Asset Solutions' Asset Management services will include mutual funds, variable products and exchange traded funds (ETFs). However, should you have a request of other securities, Asset Solutions will consider the other securities types and attempt to integrate them into your portfolio.

Financial Planning Services

Asset Solutions will provide advice on existing retirement plans; retirement plan design; estate analysis; life and health insurance needs; risk management; financial goal setting; managing cash flows, etc. Asset Solutions will also analyze, make recommendations and render advice based on the economic and tax implications of your circumstances, as they are understood at the time such services are performed.

Asset Solutions will schedule a meeting with you and present the analysis of your situation and recommendations for steps to be taken to assist you to work toward financial goals.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to Asset Solutions. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Asset Solutions cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify Asset Solutions promptly of the changes. You are advised that the advice offered by Asset Solutions may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an attorney and/or accountant.

You are not obligated to implement advice through Asset Solutions or its Advisory Representatives. Should you implement the plan with Asset Solutions' Advisory Representatives commissions or other compensation may be received in addition to the advisory fee paid to Asset Solutions.

Asset Management Services

Services you will receive include:

- Asset allocation modeling
- Specific fund selection
- Specific individual securities selection
- Monitoring and reporting rates of return
- Maintaining and reporting cost basis
- Disclosure and reporting of tax loss/gains
- Portfolio rebalancing
- Meetings at a frequency you determine to discuss your financial situation.

Upon Asset Solutions completing its analysis of your situation, Asset Solutions will determine an asset allocation customized to your financial goals, objectives and risk tolerance. Asset Solutions has designed various model portfolios. After evaluating your information gathered, Asset Solutions will determine which of its model portfolios would be most suitable for you. From there, Asset Solutions customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

Asset Solutions will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, Asset Solutions will implement the portfolio allocation. Asset Solutions will provide continuous and ongoing management of your account. You will elect in the client agreement you execute with Asset Solutions whether you will grant Asset Solutions the authority to manage your account on a discretionary basis or non-discretionary basis. If you grant discretionary authority, Asset Solutions will buy and sell securities in your account without prior consultation with you. If you elect to have the account managed on a non-discretionary basis, Asset Solutions will obtain your prior authorization before any buy or sell.

As stated above, Asset Solutions primarily uses open-ended mutual funds as well as no-load and load waived or mutual funds purchased at net asset value (NAV). However, managed accounts are not exclusively limited to mutual funds and may include stocks and bonds which are typically transferred or requested by you as well as exchange traded funds (ETFs).

You are advised transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

As further described below, Asset Solutions has entered into a relationship to offer you brokerage and custodial services through Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"). There is no affiliation between Asset Solutions and Schwab.

If you select another brokerage firm for custodial and/or brokerage services, you will not be able to receive asset management services from Asset Solutions. Implementation will be your responsibility. Advisory representatives registered with Asset Solutions are dually registered with a broker/dealer, Gëneos Wealth Management, Inc. ("Gëneos"), member FINRA and SIPC. Advisory Representatives must adhere to FINRA rules and regulations and the policies and procedures of Gëneos. Gëneos policies and procedures and FINRA have a rule that prohibits representatives from conducting transactions at a broker/dealer for which approval has not been obtained from Gëneos. Gëneos has granted approval to Advisory Representatives to utilize the services of Schwab.

Third Party Managed Programs

Asset Solutions may recommend you utilize the management programs offered by non-affiliated third party manager. Recommending you utilize a third party manager program is another way to diversify your portfolio and take advantage of various management strategies. However, no guarantees can be offered that you will achieve your investment goals or objectives.

Asset Solutions, Inc.

Asset Solutions offers you access to the following managers. However, Asset Solutions may add to the list or remove managers from the list from time to time as deemed appropriate by Asset Solutions.

- SEI
- Niemann Capital Management
- Morningstar Investment Services, Inc.

Asset Solutions will assist you with evaluating your financial situation and assist you with determining the suitability of a third party manager's service. Asset Solutions will be available to answer questions you may have regarding your account and act as the communication conduit between you and the manager.

You are advised there may be other third party managers with programs that may be equally as suitable and may cost more or less than the third party manager program(s) offered by Asset Solutions.

You are advised there may be other third party managers with programs that may be equally as suitable and may cost more or less than the third party manager program(s) offered by Asset Solutions.

Asset Solutions does not take custody of your assets, with the exception of deduction of its advisory fee from your account. With the exception of the SEI Program, Asset Solutions will not directly conduct any securities transactions on your behalf or participate directly in the selection of the securities to be purchased or sold when a third party manager has been engaged. Investment decisions are made by the third party manager in accordance with the agreement between you and the manager.

SEI

Two programs are offered through SEI: 1) SEI Asset Allocation and 2) SEI Distribution Focused Strategies.

You maintain full and complete ownership rights and ability to vote securities and/or receive a monthly report reflecting all transactions in the Account for the preceding month. SEI Trust Company will provide custodial services for the account pursuant to the custodial agreement signed by you. SEI Trust Company will provide at least quarterly statements showing all account activity.

SEI Asset Allocation

The SEI Asset Allocation Program is offered to high net worth individuals, defined benefit plans, participant and non-participant directed defined contribution plans, institutions, endowments, and foundations.

Asset Solutions will assist you, after evaluating your investment goals and objectives, to select an investment strategy and choose from one of many mutual fund asset allocation models or purchase individual mutual funds. Your account will be allocated among SEI Funds (a family

of mutual funds advised by SIMC) in accordance with the investment strategy, goal or model you have selected.

You may, at any time, impose reasonable restrictions on the management of your account. For participant-directed plans, assets will be invested in the SEI Asset Allocation mutual funds and other style-specific SEI Funds (if applicable).

Asset Solutions may also allocate your account among the SEI Funds through SEI's Private Client Models.

The SEI Funds are administered, distributed, and in some cases advised by SIMC or its affiliates for which it is paid fees as disclosed in the SEI Funds' prospectuses. The prospectus(es) should be read carefully by all investors before investing in the SEI Funds.

SEI Distribution-Focused Strategies ("DFS Program")

The DFS Program aims to generate a consistent level of distributions. In addition to attempting to meet distribution objectives, it is designed to provide a degree of principal preservation by leaving a positive residual value at the end of the strategies stated investment horizon.

Asset Solutions participates in the "MAP Program and DFS Program (together, the "Managed Account Program"). To participate in the Managed Account Program, you, Asset Solutions, and SIMC execute a Managed Account Agreement. Pursuant to a Managed Account Agreement, you appoint Asset Solutions as your investment adviser to assist you in selecting an asset allocation strategy. Additionally, you and Asset Solutions will determine the percentage assets allocated to a designated Managed Account Portfolio and the percentage of assets allocated to a portfolio of mutual funds advised by SIMC or an affiliate of SIMC. You appoint SIMC to manage assets in each Managed Account Portfolio in accordance with a strategy selected. SIMC may delegate its responsibility for selecting particular securities to one or more portfolio managers. For the DFS Program, SIMC is responsible for selecting securities (generally SEI's proprietary mutual funds) underlying each portfolio in accordance with its investment strategies, and, therefore, selecting the securities into which your assets will be invested.

SIMC may impose minimum account balances ranging from \$50,000 to \$1,000,000 depending upon the Managed Account Portfolio chosen and whether you select the tax management feature.

Morningstar Investment Services

This Program is a discretionary investment advisory program offered by Morningstar Investment Services, Inc. ("MIS").

Clients are advised there is a conflict of interest for Asset Solutions to recommend clients utilize MIS since Asset Solutions has an interest in the advisory fee charged to the client. Furthermore, clients are advised there may be other third party managers who may not share

fees with Asset Solutions and whose programs may be as suitable or more suitable for the client.

MIS has a minimum account requirement that will range from \$50,000 to \$1,000,000 depending on the program(s) selected by the client. Disclosure of MIS's minimums and fees are found in MIS's Disclosure Brochure which will be provided by Asset Solutions to the client.

Seminars

Asset Solutions conducts seminars for the employees of various federal government agencies at the request of the government agency. Topics addressed include pre-retirement planning, benefit and insurance selection and review of retirement options.

General Information

You are advised the investment recommendations and advice offered by Asset Solutions are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform Asset Solutions promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify Asset Solutions of any such changes could result in investment recommendations not meeting your needs.

Fees and Compensation

Financial Planning Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with Asset Solutions, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

Fee Type	Maximum Fee	Payable
Hourly Fee	\$150 per hour \$75 per hour for computer and administrative	Payable on an "as-billed" basis with contracts renewable on an annual basis.

Termination Provisions

You may terminate advisory services obtained from Asset Solutions, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with Asset Solutions. Thereafter, you may terminate investment advisory services upon Asset Solutions' receipt of your written notice to terminate. If you paid any fees in advance, any refund will be calculated based on time spent by Asset Solutions on your case.

Asset Solutions, Inc.

Services will be deemed completed and the agreement terminated, unless otherwise agreed to by Asset Solutions, upon presentation of the analysis and/or recommendations.

Asset Management Services

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

Fees are calculated and billed on a calendar quarterly basis, in arrears, based on the value of the account on the last business day of the just completed calendar quarter. Fees will be pro-rated for those accounts established during a calendar quarter. The fees will be either extracted from the managed account or billed directly to you, depending on the client/adviser agreement. You may authorize Asset Solutions' advisory fee be deducted directly from your account by execution of the client/adviser agreement.

If you have your fees debited directly from a specified account, you will be provided with an account statement direct from the account custodian reflecting the deduction of the advisory fee. If the Account does not contain sufficient funds to pay advisory fees, Asset Solutions has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to Asset Solutions, except for ERISA and IRA accounts.

You may make additions to the Account or withdrawals from the Account. No fee adjustments will generally be made for partial withdrawals from the account, additional deposits to the account, or for Account appreciation or depreciation

Account Size	Annual Fee
First \$100,000	1.25%
\$100,001 to \$200,001	1.15%
\$200,001 to \$300,000	1.05%
\$300,001 to \$400,000	0.95%
\$400,001 to \$500,000	0.85%
\$500,001 to \$600,000	0.75%
\$600,001 to \$700,000	0.65%
\$700,001 to \$800,000	0.55%
\$800,001 and above	0.45%

Asset Solutions aggregates or households all of your managed accounts together to determine your quarterly fee.

The following formula is used to calculate your quarterly fee:

$$\text{Account Value} \times \text{fee \%} = \text{Annual Fee} / 4 = \text{Quarterly Fee}$$

Asset Solutions may change the above fee schedule upon 30-days prior written notice to you.

In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally,

you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by Asset Solutions and are charged by the product, broker/dealer or account custodian. Asset Solutions does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with Asset Solutions and are compensation to the fund-manager. You should read the mutual fund prospectus prior to investing.

You may purchase the securities recommended by Asset Solutions directly or through other brokers or agents not affiliated with Asset Solutions.

Termination Provisions

You may terminate investment advisory services obtained from Asset Solutions, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with Asset Solutions. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate investment advisory services upon Asset Solutions' receipt of your written notice to terminate. Should you terminate investment advisory services during a quarterly period, you will be responsible for a prorated portion of the advisory fee for the quarter up to the date of termination. At Asset Solutions' discretion, prorated fees may be waived for terminations occurring during a calendar quarter. The determination to waive the fee for the quarter for early terminations will be dependent on the amount of work performed.

Third Party Managed Programs

Niemann Capital Management

You will be charged an advisory fee that will be in accordance with the third party manager's fee schedule. Additionally, you will be charged a fee by Asset Solutions not to exceed 1.25% annually. Asset Solutions' fee will be calculated and collected by the third party manager and remitted to Asset Solutions.

It is very important you refer to the third party manager's disclosure brochure for details on when advisory fees are calculated and deducted from the account, additional disclosure about the managed program and the costs involved with the program.

You are advised that fees for third party managed programs may be higher or lower than if you directly obtained the services of the third party manager or if you obtained advisory services separately.

SEI

For each of the mutual funds for which SIMC serves as investment advisor, the fund pays an advisory fee that is based on a percentage of the portfolio's average daily net assets, as described in the mutual fund's registration statement. From such amount, SIMC pays the sub-advisor(s) to the portfolio. SIMC's fee is negotiable, but it typically ranges from .10% - 2.00% of the portfolio's average daily net assets for its advisory services. Additionally, SIMC or an affiliate provides

administrative, distribution and transfer agency services to all of the portfolios within the SEI Funds, as described in the SEI Funds' registration statements. These fees and expenses are paid by the SEI Funds but ultimately are borne by each shareholder of the SEI Funds.

Additionally, for the DFS Program, you will pay a Program Fee of 0.20% to SIMC for providing administrative and recordkeeping services to accounts invested in the DFS Program. The fee is calculated and paid to SIMC quarterly in arrears.

Advisory fees are deducted from your account on a quarterly basis in accordance with the client agreement. You will be charged a quarterly fee at the end of each calendar quarter based upon the value of the account on the last business day of the calendar quarter. Advisory fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds. In the event the account is opened on a day other than the first day of the calendar quarter or closed on a day other than the last day of the calendar quarter, advisory fees will be prorated based on the number of days during the calendar quarter during which the account was open. If the account was opened during the last ten (10) days of the calendar quarter, the advisory fee for the prorated number of days for which the account was opened will be charged at the end of the next full calendar quarter. Additional deposits to the account will be subject to the same billing procedures. Advisory fees are in accordance with the fee schedule below:

In addition to advisory fees, you may incur charges imposed by SEI in connection with investments made through the SEI Program such as SEI fund management fees, administrative servicing fees, SEI account maintenance fees, and other fees charged by SEI or the custodian for any IRA or qualified retirement account. Information regarding charges and fees assessed by SEI is further disclosed in the SEI Fund prospectus and in the SEI Client Agreement.

You may terminate the Program within five (5) business days of execution of the advisory agreement without penalty. Thereafter, you may terminate upon Asset Solution's receipt of your written notice to terminate. You will be responsible for a prorated portion of the advisory fee for the quarter up to the date of termination.

Morningstar Investment Services

MIS will receive compensation for their investment advisory services provided under the Program as a percentage of assets. Asset Solutions will receive a portion of the fee paid by each client participating in this Program to MIS.

Clients will be charged a fee by MIS, not to exceed 3%. A portion of the fee collected by MIS will be paid to Asset Solutions. Disclosure of the fees associated with the MIS program are contained in the MIS Disclosure Brochure which will be provided by Asset Solutions to the client.

Seminars

Fees are negotiated on a case-by-case basis depending on the number of employees attending the seminar and the topics covered. Fees will generally range up to \$7,000 and are generally due to Asset Solutions in full upon completion of the seminar. Fees will be quoted based on a variety of

factors including but not limited to travel expenses, length of the seminar, content, materials needed, and number of attendees.

Termination of services will be effective upon receipt of written notice. Should termination of services occur 30-days prior to the seminar, you will be responsible to pay 50% of the quoted fee to Asset Solutions as a result of expenses incurred such as materials, travel expenses, etc. Refunds for prepaid fees will be agreed upon by both parties upon entering into the relationship.

Performance-Based Fees and Side-By-Side Management

This section is not applicable to Asset Solutions since Asset Solutions does not charge performance based fees.

Types of Clients

Asset Solutions' services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth, trusts, estates and/or charitable organizations

Asset Solutions does not impose minimums for clients to obtain advisory services. However, the third party managers offered by Asset Solutions may impose account minimums. You must refer to the disclosure brochure for details of account minimums imposed by third party managers offered by Asset Solutions.

Methods of Analysis, Investment Strategies and Risk of Loss

Asset Solutions uses a combination of fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

Model managed portfolios are designed using historical beta and standard deviation numbers. The goal is to design portfolios that address various risk tolerance levels.

Asset Solutions does not represent, warranty or imply that the services or methods of analysis used by Asset Solutions can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Asset Solutions will provide a better return than other investment strategies.

As stated above, Asset Solutions primarily uses mutual funds and strives to use no-load, no transaction fee funds. The risks with mutual funds include the costs and expenses within the fund

that can impact performance, change of managers, and fund straying from its objective. Open ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by Asset Solutions will require you to prepare to bear the risk of loss and fluctuating performance.

Disciplinary Information

There is no reportable disciplinary information required for Asset Solutions or its management persons that is material to your evaluation of Asset Solutions, its business or its management persons.

Other Financial Industry Activities and Affiliations

As previously stated, Advisory Representatives are dually registered as an advisory representative of Asset Solutions as well as a registered representative of Gëneos Wealth Management, Inc. ("Gëneos"). You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at Gëneos than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through Gëneos in that the higher their production with Gëneos the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of the FINRA, Gëneos has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of Gëneos. For such supervisory functions, Asset Solutions may pay Gëneos a portion of the advisory fees they receive. Gëneos and Asset Solutions are not affiliated.

Advisory Representatives are licensed with various insurance companies. Commissions will be earned if the insurance products are purchased through them. You are under no obligation to purchase insurance products or services through him. While the insurance business is not a significant business to the Advisory Representatives and they do not concentrate resources toward the business, because of the conflict of interest in having you purchase insurance products through them, this disclosure is provided to you.

Asset Solutions attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as a registered representative with Gëneos, Advisory Representatives are subject to a supervisory structure at Gëneos for his securities business.

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

Asset Solutions and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, Asset Solutions and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. Asset Solutions and its associated persons will not put their interests before your interest. Asset Solutions and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

Asset Solutions is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. Asset Solutions and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Code of Ethics

Asset Solutions has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Asset Solutions takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as Asset Solutions' policies and procedures. Further, Asset Solutions strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with Asset Solutions' Privacy Policy. As such, Asset Solutions maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, Asset Solutions' Code of Ethics establishes Asset Solutions' expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Brokerage Practices

As previously stated, Advisory Representatives are registered representatives of Gëneos. As a result they are subject to FINRA Conduct Rule 3040 which may restrict such them from conducting securities transactions away from Gëneos unless Gëneos provides him with written authorization. Advisory Representatives have obtained approval to offer you the ability to maintain accounts through Gëneos at its clearing firm or through Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a registered broker/dealer, member FINRA and SIPC. Asset Solutions is independently owned and operated and not affiliated with Schwab or Gëneos.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by Asset Solutions will be limited to only advice and will not include implementation. If you who select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from Asset Solutions. If you elect to implement investment recommendations through Advisory Representatives and consequently

through Gěneos, you are advised you may not be able to achieve the most favorable execution and it may cost you more money.

In initially selecting Gěneos and Schwab, Asset Solutions conducted due diligence. Asset Solutions' evaluation and criteria included ability to service you, staying power as a company, industry reputation, ability to report to you and to him, trading platform, products and services available, technology resources, and educational resources.

Periodically, Asset Solutions will review alternative broker/dealers and custodians in the marketplace to ensure Gěneos and Schwab and its custodians are meeting Asset Solutions' duty to provide best execution for your accounts. The review will include a comparison to Gěneos and Schwab which involve evaluating criteria such as overall expertise, cost competitiveness and financial condition. The quality of execution by Gěneos and Schwab will be reviewed through trade journal evaluations. However, best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

Additionally, product sponsors such as variable and investment companies and limited partnerships which are recommended to you may provide support to Asset Solutions and Advisory Representatives. Such support includes research, educational information, and monetary support for due diligence trips and client events.

You are advised there is an incentive for Asset Solutions and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

Schwab

Schwab provides Asset Solutions with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge so long as a total of at least \$10 million of Asset Solutions' clients' assets is maintained in accounts at Schwab Institutional. Further there is no other contingent upon Asset Solutions committing to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Asset Solutions' clients' accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab makes available to Asset Solutions other products and services that benefit Asset Solutions but may not benefit you. Some of these other products and services assist Asset Solutions in managing and administering your accounts. These include software and other technology that provide access to your account data, such as trade confirmation and account statements; facilitate trade execution and allocation of aggregated trade orders for multiple client accounts; provide

research, pricing information and other marked data; facilitate payment of Asset Solutions' fees from your accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Asset Solutions' accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional also makes available to Asset Solutions other services intended to help Asset Solutions manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to Asset Solutions by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to Asset Solutions. While as a fiduciary, Asset Solutions endeavors to act in your best interests, and Asset Solutions' recommendation that you maintain your assets in accounts at Schwab may be based in part on the benefit to Asset Solutions of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab which may create a potential conflict of interest.

From time-to-time Advisor may make an error in submitting a trade order on your behalf. When this occurs, Advisor may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). If the gain does not remain in your account and Charles Schwab & Co. Inc. ("Schwab") is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, Advisor will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

Gěneos

Gěneos has a wide range of approved securities products for which Gěneos performs due diligence prior to selection. Gěneos registered representatives are required to adhere to these products when implementing securities transactions through Gěneos. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Gěneos also provides Advisory Representatives, and therefore the Asset Solutions, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and Asset Solutions manage and further develop its business enterprise.

Gěneos also make available to Asset Solutions other products and services that benefit Asset Solutions but may not directly benefit you. Some of these other products and services assist Asset Solutions with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data;

facilitate payment of Asset Solutions' fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Asset Solutions' accounts, including accounts not held through Gēneos.

Advisory Representatives as a Registered Representatives may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through Gēneos. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees may be initially paid to Gēneos and a portion passed to the Advisory Representative of record. The receipt of such fees could represent an incentive for Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

Review of Accounts

Asset Management

You will be invited to participate in at least an annual review. It is important that you commit to at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Levels and frequency of reviews will vary depending on your needs. Additionally, changes to your financial status or position (tax status or otherwise), financial goals, current market conditions, performance standards, suitability changes, and age, among other things should trigger or result in you requesting a review.

Asset Solutions monitors your managed accounts for changes or shifts in the economy, changes in the management of a mutual fund or company in which client assets are invested, and market shifts and corrections. Your accounts are reviewed not less than quarterly.

Financial Planning Services

Asset Solutions suggests any plan or analysis be reviewed at least annually. Reviews will only be conducted if requested by the client. Additional fees in accordance with Asset Solutions Financial Planning Services fee schedule above will apply, unless you are participating in asset management services.

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian.

Client Referrals and Other Compensation

Product vendors recommended by Asset Solutions may provide monetary and non-monetary assistance with client events, provide educational tools and resources. Asset Solutions does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. Asset Solutions' due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and Asset Solutions.

Please refer to the disclosures under the section Brokerage Practices above for information regarding the economic benefits received from Gěneos and Schwab.

Asset Solutions may enter into arrangements with individuals (“Solicitor”) whereby the Solicitor will refer clients who may be a candidate for investment advisory services to Asset Solutions. In return, Asset Solutions will agree to compensate the Solicitor for the referral. Compensation to the Solicitor is dependent on the client entering into an advisory agreement with Asset Solutions for advisory services. Compensation to solicitor will be an agreed upon percentage of Asset Solutions’ advisory fee. Asset Solutions’ referral program is in compliance with the federal regulations as set out in 17 CFR Section 275.206(4)-3. The Solicitor will be required to provide the client with a copy of Asset Solutions’ Disclosure Brochure and a Solicitor Disclosure brochure prior to or at the time of entering into any investment advisory contract with Asset Solutions. Solicitor is not permitted to offer clients any investment advice on behalf of Asset Solutions. Clients’ advisory fee will not be increased as a result of compensation being shared with Solicitor.

Custody

With the exception of deduction of Asset Solutions’ advisory fees from your accounts, Asset Solutions does not take custody of your funds or securities.

Investment Discretion

You may grant Asset Solutions authorization to manage your account on a discretionary basis. You will grant such authority to Asset Solutions by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by Asset Solutions.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) Asset Solutions requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of Asset Solutions’ advisory fees from the account, if you have authorized automatic deductions, Asset Solutions will not have the ability to withdraw your funds or securities from the account.

Voting Client Securities

Asset Solutions does not vote your securities.

Financial Information

Asset Solutions, Inc.

Asset Solutions will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service. Furthermore, Asset Solutions does not require any prepayment of fees.

Requirements for State Registered Advisers

This section is not applicable to Asset Solutions. Asset Solutions is not state registered. Asset Solutions is registered with the Securities and Exchange Commission.