

Uniform Application for Investment Adviser Registration

Part II - Page 1

Name of Investment Adviser:

Asset Strategies Portfolio Services, Inc.

Address: (Number and Street)

2635 Lapeer Road

(City)

Auburn Hills

(State)

MI

(Zip Code)

48326

Area Code: Telephone number:

(248) 373-9900

This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

1. **A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service.
(See instructions below.)

Applicant:

<input type="checkbox"/>	(1)	Provides investment supervisory services		%
<input type="checkbox"/>	(2)	Manages investment advisory accounts not involving investment supervisory services		%
<input checked="" type="checkbox"/>	(3)	Furnishes investment advice through consultations not included in either service described above	100	%
<input type="checkbox"/>	(4)	Issues periodicals about securities by subscription		%
<input type="checkbox"/>	(5)	Issues special reports about securities not included in any service described above		%
<input type="checkbox"/>	(6)	Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities		%
<input type="checkbox"/>	(7)	On more than an occasional basis, furnishes advice to clients on matters not involving securities		%
<input type="checkbox"/>	(8)	Provides a timing service		%
<input type="checkbox"/>	(9)	Furnishes advice about securities in any manner not described above		%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term?

Yes
☐No
☒

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed Fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

3. **Types of Investments.** Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input checked="" type="checkbox"/> (3) foreign issuers | <input checked="" type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input checked="" type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | <input checked="" type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input checked="" type="checkbox"/> (1) real estate |
| G. Investment company securities: | <input checked="" type="checkbox"/> (2) oil and gas interests |
| <input checked="" type="checkbox"/> (1) variable life insurance | <input checked="" type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. **Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|--|---|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|---|---|
| (1) <input type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes ☒ No ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

<ul style="list-style-type: none"> • name • year of birth 	<ul style="list-style-type: none"> • formal education after high school • business background for the preceding five years
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7. Other Business Activities. (check those that apply)

☐ A. Applicant is actively engaged in a business other than giving investment advice.

☐ B. Applicant sells products or services other than investment advice to clients.

☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.

☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.

☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<input type="checkbox"/> (1) broker-dealer <input type="checkbox"/> (2) investment company <input type="checkbox"/> (3) other investment adviser <input type="checkbox"/> (4) financial planning firm <input type="checkbox"/> (5) commodity pool operator, commodity trading advisor or futures commission merchant <input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (7) accounting firm <input type="checkbox"/> (8) law firm <input type="checkbox"/> (9) insurance company or agency <input type="checkbox"/> (10) pension consultant <input type="checkbox"/> (11) real estate broker or dealer <input type="checkbox"/> (12) entity that creates or packages limited partnerships
--	---

(For each checked in box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes ☐ No ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. **Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☐ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. **Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes No
☐ ☒

(If yes, describe on Schedule F)

11. **Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Where services are ongoing in nature, Asset Strategies Portfolio Services compiles, reviews and analyzes a wide variety of information regarding clients' past, present and anticipated financial situation, financial needs/objectives, tax status and cash flow. This information includes, but is not restricted to, supplemental reports received from clients' investment manager or managers, custodian, bank, actuary or plan administrator. Investment objective, policies and guidelines are reviewed and consideration given to the outcome of such data analysis.

Clients are obligated to ensure that Asset Strategies Portfolio Services receives copies of statements from their other financial service providers in a timely manner. Clients are obligated to immediately notify the Adviser of any change in financial situation that may require a review or re-evaluation of the consulting services being provided.

A senior member of the Adviser reviews client transactions quarterly, semi-annually or annually, according to the terms of the engagement. George H. Vitta is the President in charge of the review process and client services. Data may also be peer reviewed by senior consultants. Advice is provided by senior consultants of the Firm, under the direction of George Vitta, as President. Administrative personnel may assist with the handling of data and general client services.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Clients receive standard reports generated by their chosen financial services providers (i.e., custodians and broker/dealers) when transactions occur, monthly and/or quarterly.

Asset Strategies Portfolio Services may prepare customized reports at the request of the client and these are dependent upon the nature of services provided. The Adviser may also produce performance measurement reports and additional analysis on a quarterly, semi-annual or annual basis, depending upon the nature of services and as requested by clients.

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | | |
|--|--------------------------|-------------------------------------|
| | Yes | No |
| (1) securities to be bought or sold? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| (2) amount of the securities to be bought or sold? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| (4) commission rates paid? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? *(General Recommendations Only)*

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and Services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|--------------------------|-------------------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| B. directly or indirectly compensates any person for client referrals? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?	Yes	No
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Asset Strategies Portfolio Services, Inc.	801- 62049	03/01/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Asset Strategies Portfolio Services, Inc.	IRS Empl. Ident. No.: 38-3050426
Item of Form (identify)	Answer

Page 1 of 6
1.D

Advisory Services and Fees

Asset Strategies Portfolio Services, Inc. "Asset Strategies" or "Adviser" is a Registered Investment Advisory Firm providing **Investment Consultation Services**.

Asset Strategies will generally provide an initial interview and gather data to determine the nature of services desired/needed by the client. While the Firm may offer complimentary interview and review services, investment advisory services begin with the execution of a client agreement.

The client may receive one or more of the following customized services:

- Asset/Liability Analysis
- Asset Allocation Modeling and Liquidity Analysis
- Development of Investment Policy, Procedures and Objectives
- Development of Spending and Income Policy for Endowments, Foundations and Trusts
- Investment Manager Evaluation and Selection
- Master Trust and Custodial Bank Evaluation and Selection
- Performance Monitoring and Evaluation (Historical and Ongoing)
- Evaluation and Consultation on Commission Recapture and Soft-Dollar Programs
- Defined Benefit Plan Termination and Liability Transfer or Immunization; Group Annuity Contract Audit and Renegotiation, Guaranteed Investment Contract Analysis and Placement and Stable Value Fund Alternatives
- Complete Defined Contribution Plan Services

Asset Strategies does not provide investment management services nor does the Adviser assume any form of discretionary trading authority to execute transactions. Clients or their investment manager(s) retain authority to proxy-vote. Additionally, Asset Strategies does not take custody of client's funds or securities.

Investment Consulting Services involve the frequent monitoring (generally quarterly) and review of portfolio assets. At least annually, Asset Strategies will contact clients to review investment and ongoing needs but clients are obligated to contact Asset Strategies promptly if there has been any change in the clients' current financial status information to determine if there needs to be a change in investment objectives. Clients may call the office at any time during normal business hours to discuss directly with an Advisory Representative of Asset Strategies, the client's account, financial situation or investment needs.

Clients will receive monthly transaction statements as they may occur, and will receive a monthly or quarterly statement of the account from the custodian or brokerage firm. Additionally, Asset Strategies can prepare consolidated quarterly reports for clients upon request. The Adviser may make reports available through the Internet. (Generally Internet information available through custodians is delayed 24 hours).

Fees for Investment Management Services are based upon the amount of assets, complexity of services and individual circumstances. Fees are billed either concurrently or in arrears of services. Asset Strategies offers a basic consulting package that includes the first four services listed above. Advisory fees are invoiced directly to the client. The fee is based upon a negotiated fixed sum and agreed upon at the time of engagement.

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:

Asset Strategies Portfolio Services, Inc.

SEC File Number:

801- 62049

Date:

03/01/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Asset Strategies Portfolio Services, Inc.

IRS Empl. Ident. No.:

38-3050426

Item of Form
(identify)

Answer

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Any of the aforementioned services may be provided separately or in combination. Fees are subject to negotiation. Fees may be modified based upon the nature of services to be provided or some other circumstance as identified by the Adviser and the client. The nature of services and fees are determined at the time of engagement. Fees may be hourly or retainer based.

Hourly fees are as follows:

\$275 – Managing Consultant
\$175 – Senior Consultant
\$110 – Analyst
\$ 90– Administrative Staff

Annual retainer fees are as follows:

Minimum fee: \$25,000.00
.10% on the first \$25 million
.05% on the next \$75 million
Negotiable thereafter

Annual retainers are invoiced on quarterly or monthly basis as determined at the time of engagement. The fee to be charged will be based upon the fair market value of the client's portfolio as of the last trading day of the relevant calendar month or quarter. Where services are initiated at anytime other than the beginning of a calendar month or quarter, fees will be prorated.

Investment advisory services not involving securities may include an insurance contract or risk management analysis. A fixed fee is charged for this service and is determined by the nature and complexity of the services desired. Fees are determined at the time of engagement.

Where the Adviser has not delivered the ADV Part II to the client at least 48 hours prior to engagement, clients can terminate the agreement without fees due. Otherwise, clients will only be invoiced for services provided up until the date of termination. Where any portion of a fee is paid in advance (i.e., a retainer), unused fees will be promptly refunded after the effective date of termination. The Adviser and the client have the right to terminate the engagement with 30 days written notice.

Fees are not collected for services to be performed more than six months in advance. Additionally, Asset Strategies does not charge performance-based fees as defined by the United States Securities and Exchange Commission's Investment Advisers Act of 1940.

Asset Strategies' advisory fees represent fees for advisory services only. Clients may pay fees associated with investment and/or trust accounts to unaffiliated services providers as chosen by the client. Asset Strategies receives no portion of these fees. All fees paid to the Adviser for advisory services are separate from fees and expenses charged to shareholders of mutual funds or by the adviser managing the funds. A complete explanation of fund expenses charged by mutual funds is contained in each mutual fund's prospectus. Investors contemplating mutual fund investments should read each fund prospectus carefully before investing.

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

Asset Strategies Portfolio Services, Inc.

SEC File Number:

801- 62049

Date:

03/01/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Asset Strategies Portfolio Services, Inc.

IRS Empl. Ident. No.:

38-3050426Item of Form
(identify)

Answer

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3.K & L.**Types of Investments**

The Adviser offers a complete Investment Consulting service. The Adviser may provide advice with regard to partnerships involving equipment leasing, receivables financing, REIT's or other alternative investments. These vehicles are viewed as alternatives to engaging money managers who typically assemble a portfolio of segregated stocks and bonds for their client. The Adviser limits advice to the review of the offering document for appropriateness of the investment.

4. A., B., & C.

Method of Analysis and Investment Strategies

The nature of investment advisory services is dependent upon the needs and goals as identified by each client during an interview and data-gathering process. As it relates to the investment advisory services provided by Asset Strategies, no formal securities "analysis" is undertaken. The Adviser only provides advice and recommendations regarding investment classes. No specific securities recommendations are made to clients as part of the advisory process. In the event the Adviser's input is solicited by the client during implementation, the Adviser may provide guidance on a case-by-case basis.

As it relates to the Adviser's provision of asset allocation services, the Adviser relies both on its own quantitative research and the research and data supplied by others.

The main sources of information utilized by the Adviser includes third party services, financial newspapers and trade magazines, research materials prepared by others, academic studies and information from the client, including, but not limited to, their investment objectives, experience and individual circumstances. Recommendations for investments will be based on publicly available reports and analysis.

Asset Strategies, through its provision of advisory services to clients, make recommendations relating to investment asset classes. Investment strategies which the client chooses to utilize in the implementation of such advice could virtually take any form, depending upon the client's particular circumstances and asset type involved. With regard to Asset Strategies' asset allocation advice, recommendations are directly related to the client's long and/or short-term objectives.

The investment strategies used to implement any advice given to clients may include assisting them with setting objectives for their funds which takes into consideration such factors as their willingness to accept tradeoffs between risk and reward along the Capital

Market Line. The security selection for meeting these objectives is left to the independent money manager hired by the client.

5.

Business Standards:

The following qualifications, generally and in combination, represent acceptable criteria for those involved in determining or giving investment advice: (1) Acceptable prior academic achievement; (2) Ten years of experience in financial services or related industry, including experiential background as a plan sponsor, portfolio manager, consultant or provider of investment services to institutional investors or; (3) Be enrolled in or have completed the CFA examination program and/or other professional program which enhances the knowledge and experience of the advisory representative.

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:

Asset Strategies Portfolio Services, Inc.

SEC File Number:

801- **62049**

Date:

03/01/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Asset Strategies Portfolio Services, Inc.		IRS Empl. Ident. No.: 38-3050426
Item of Form (identify)	Answer	

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6.

Education and Business Background:

George H. Vitta, President

Year of Birth: 1956

Education:

University of Michigan, B.A. / Economics

Wayne State University, M.B.A. / Finance

Business:

Asset Strategies Portfolio Services, Inc., Auburn Hills, MI, President

Registered Investment Adviser 1992 - Present

9.E

Participation or Interest in Client Transactions

At times, the interests of advisory affiliates may coincide with the interests of clients' accounts; however at no time will the Adviser or any related person receive an added benefit or advantage over clients with respect to transactions. Asset Strategies does not participate in the execution of securities transactions for clients. However, the Adviser acknowledges its fiduciary responsibility to put client interests ahead of its (or affiliates') own. The Adviser will maintain a record of personal securities transactions. All applicable rules of the Investment Advisers Act of 1940 will be strictly enforced. The Investment Adviser will not permit insider trading.

12.B

Brokerage Recommendations

It is unlikely that the Advisory Representatives of Asset Strategies would recommend service providers to clients. Clients utilize the investment manager or managers, broker/dealers, banks, and custodians of their choice. However, Advisory Representatives of Asset Strategies may offer general information regarding available service providers.

Privacy of Consumer Financial Information

Asset Strategies, as a Registered Investment Advisory Firm is covered under the definition of a "financial institution" under the Gramm-Leach-Bliley Act and is subject to the rules of privacy imposed under the Act and the Securities Exchange Commission's Privacy Rule ("Regulation S-P"). The Rule requires every Adviser to adopt policies and procedures reasonably designed to safeguard consumer/client information. The Adviser maintains compliance with the Rule. The types of information we may collect will generally include:

- Information provided in applications and forms or otherwise provided to us either verbally or in writing, and include but are not limited to your name, address, phone number, account information, and trustee data;

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

Asset Strategies Portfolio Services, Inc.

SEC File Number:

801- 62049

Date:

03/01/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Asset Strategies Portfolio Services, Inc.

IRS Empl. Ident. No.:

38-3050426Item of Form
(identify)

Answer

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- Information about transactions, accounts, trading activity and parties to transactions;
- Information from other outside sources;
- Any other information that is deemed to be nonpublic personal information as defined by the Gramm-Leach-Bliley Act.

The associated persons of Asset Strategies understand that the sharing of nonpublic personal information is an act of trust. Information provided by consumers or clients to Asset Strategies and information and advice furnished by the Firm to clients, shall be treated as confidential and not disclosed to unaffiliated third parties, except as permitted by clients with written authorization (letter or application to facilitate services offered), or as required by rule, regulation or law of any regulatory organization to which Asset Strategies or its associated persons may be subject. Clients are welcome to contact George H. Vitta, the President of Asset Strategies with any questions or concerns relating to the Adviser's Privacy Policy.

Code of Ethics

Asset Strategies has adopted the CFA Institute's Code of Ethics and Standards of Professional Conduct for itself and its employees. Acknowledging our role as co-fiduciary with our clients, Asset Strategies and its employees shall:

- Maintain knowledge of and comply with all applicable laws, rules, and regulations of any government, governmental agency, regulatory organization, licensing agency, or professional association governing its professional activities.
- Refuse to knowingly participate or assist in any violation of such laws, rules or regulations.
- Act with integrity, competence, dignity, and in an ethical manner when dealing with the public, clients, prospects and co-workers.
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on Asset Strategies, their employees and other professional consultants.
- Strive to maintain and improve their competence and the competence of others in the profession.
- Use reasonable care and exercise independent professional judgment.

A copy of the CFA Institute's Code of Ethics and Standards of Professional Conduct will be provided upon request.

END OF SCHEDULE F**Complete amended pages in full, circle amended items and file with execution page (page 1).**