



## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Financial Security Services LLC. If you have any questions about the contents of this brochure, please contact us at (561) 630-8422 or by email at: [info@wealthmanagers.net](mailto:info@wealthmanagers.net). 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 Financial Security Services LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Financial Security Services LLC's CRD number is: 135122*

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*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

Financial Security Services LLC has transitioned from SEC to state registration since the previous annual amendment filed on March 24, 2011.

## Item 3: Table of Contents

### Table of Contents

Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business.....	1
A. Description of the Advisory Firm.....	1
B. Types of Advisory Services.....	1
Investment Supervisory Services.....	1
Financial Planning.....	1
Services Limited to Specific Types of Investments.....	2
C. Client Tailored Services and Client Imposed Restrictions .....	2
D. Wrap Fee Programs .....	2
E. Amounts Under Management .....	2
Item 5: Fees and Compensation.....	3
A. Fee Schedule .....	3
Investment Supervisory Services Fees .....	3
Financial Planning Fees .....	3
Hourly Fees .....	3
B. Payment of Fees.....	4
Payment of Investment Supervisory Fees .....	4
Payment of Financial Planning Fees .....	4
C. Clients Are Responsible For Third Party Fees.....	4
D. Prepayment of Fees .....	4
E. Outside Compensation For the Sale of Securities to Clients .....	4
Item 6: Performance-Based Fees and Side-By-Side Management .....	5
Item 7: Types of Clients .....	5
Minimum Account Size .....	5
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	5
A. Methods of Analysis and Investment Strategies.....	5
Methods of Analysis .....	5
Fundamental analysis .....	5
Investment Strategies.....	5
B. Material Risks Involved .....	5
Methods of Analysis .....	5
Fundamental analysis .....	5
Investment Strategies.....	6
C. Risks of Specific Securities Utilized.....	6
Item 9: Disciplinary Information .....	7
A. Criminal or Civil Actions.....	7

B.	Administrative Proceedings.....	7
C.	Self-regulatory Organization (SRO) Proceedings .....	7
Item 10:	Other Financial Industry Activities and Affiliations.....	7
A.	Registration as a Broker/Dealer or Broker/Dealer Representative .....	7
B.	Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	8
C.	Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	8
D.	Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	8
Item 11:	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	8
A.	Code of Ethics .....	8
B.	Recommendations Involving Material Financial Interests .....	8
C.	Investing Personal Money in the Same Securities as Clients.....	9
D.	Trading Securities At/ Around the Same Time as Clients' Securities .....	9
Item 12:	Brokerage Practices .....	9
A.	Factors Used to Select Custodians and/or Broker/Dealers .....	9
1.	Research and Other Soft-Dollar Benefits .....	9
2.	Brokerage for Client Referrals.....	11
3.	Clients Directing Which Broker/Dealer/Custodian to Use.....	11
B.	Aggregating (Block) Trading for Multiple Client Accounts.....	11
Item 13:	Reviews of Accounts.....	11
A.	Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	11
B.	Factors That Will Trigger a Non-Periodic Review of Client Accounts .....	12
C.	Content and Frequency of Regular Reports Provided to Clients.....	12
Item 14:	Client Referrals and Other Compensation .....	12
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	12
B.	Compensation to Non – Advisory Personnel for Client Referrals.....	13
Item 15:	Custody .....	13
Item 16:	Investment Discretion.....	13
Item 17:	Voting Client Securities (Proxy Voting).....	13
Item 18:	Financial Information.....	14
A.	Balance Sheet.....	14
B.	Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....	14
C.	Bankruptcy Petitions in Previous Ten Years .....	14
Item 19:	Requirements For State Registered Advisers.....	14
A.	Principal Executive Officers and Management Persons; Their Formal Education and Business Background .....	14
B.	Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any).....	14
C.	How Performance Based Fees are Calculated and Degree of Risk to Clients .....	14
D.	Material Disciplinary Disclosures for Management Persons of this Firm.....	15
E.	Material Relationships That Management Persons Have With Issuers of Securities (If Any) .....	15

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Financial Security Services LLC is a Limited Liability Company organized in the state of Florida. This firm has been in business since September 1, 2000 and the principal owners are Jay L. Marmer and Steven E. Marcus.

### B. Types of Advisory Services

Financial Security Services LLC (hereinafter "FSS") offers the following services to advisory clients:

#### *Investment Supervisory Services*

FSS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. FSS creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

FSS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. FSS will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to any transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

#### *Financial Planning*

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

### ***Services Limited to Specific Types of Investments***

FSS generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, REITs, insurance products including annuities, private placements, and government securities. FSS may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

FSS offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent FSS from properly servicing the client account, or if the restrictions would require FSS to deviate from its standard suite of services, FSS reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. FSS DOES NOT participate in any wrap fee programs.

### **E. Amounts Under Management**

FSS has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$33,681,590.00	\$0.00	03/01/2012

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Total Assets Under Management	Annual Fee
First \$500,000	2.00%
\$500,001 - \$750,000	1.50%
Over \$750,000	1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in advance, and clients may terminate their contracts with five days' written notice. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

Refunds are given on a prorated basis, based on the number of days remaining in a month at the point of termination. Fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the month terminated. The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the month up to and including the day of termination. (\*The daily rate is calculated by dividing the monthly AUM fee by the number of days in the termination month). Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract.

#### *Financial Planning Fees*

##### *Hourly Fees*

The hourly fee for these services is \$180. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. If a client is unhappy FSS will return 100% of their collected fee unless the contract states otherwise.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in advance. Advisory fees may also be invoiced and billed directly to the client with payments due on the first of the month. Clients may select the method in which they are billed.

### ***Payment of Financial Planning Fees***

Hourly Financial Planning fees are paid via check in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

## **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FSS. Please see Item 12 of this brochure regarding broker/custodian.

## **D. Prepayment of Fees**

FSS collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check.

The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the month up to and including the day of termination. (\*The daily rate is calculated by dividing the monthly AUM fee by the number of days in the termination month).

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither FSS nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.



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

FSS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

FSS generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

### *Minimum Account Size*

There is an account minimum, \$250,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

FSS's primary method of analysis includes fundamental analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

#### *Investment Strategies*

FSS uses long term trading and short term trading strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

#### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in

Form ADV 2A Version: 3/23/2012

stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

### ***Investment Strategies***

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

FSS generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

**Equity** investments generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

**Private placements** carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

**Precious Metal ETFs** (Gold, Silver, Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither FSS nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

## **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither FSS nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

## **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Jason Marmer and Steven Marcus are licensed insurance agents in Florida, and Gregory King is a licensed insurance agent in the state of Georgia. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FSS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of FSS in their capacity as an insurance agent.

## **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

FSS does not utilize nor select other advisers or third party managers. All assets are managed by FSS management.

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

## **A. Code of Ethics**

FSS has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FSS' Code of Ethics is available free upon request to any client or prospective client.

## **B. Recommendations Involving Material Financial Interests**

FSS does not recommend that clients buy or sell any security in which a related person to FSS or FSS has a material financial interest.

Form ADV 2A Version: 3/23/2012

### **C. Investing Personal Money in the Same Securities as Clients**

FSS will only block trade across client accounts. Representatives of FSS will buy or sell securities for themselves at the same time as clients. FSS will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

FSS will only block trade across client accounts. Representatives of FSS will buy or sell securities for themselves at the same time as clients. FSS will always transact client's transactions before its own when similar securities are being bought or sold.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

The Custodian, TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., a member FINRA/SIPC/NFA ("TD Ameritrade"), was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. FSS will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### ***1. Research and Other Soft-Dollar Benefits***

FSS also participates in the Amerivest sub-advisory service. This is the institutional advisor program (the "Program") offered by TD Ameritrade, an unaffiliated SEC registered broker/dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. FSS receives some benefits from TD Ameritrade through its participation in the Program.

In selecting TD Ameritrade, Inc. as the broker and TD Ameritrade Clearing, Inc. as the custodian for certain of its current and future Client accounts, FSS also considers its agreement with TD Ameritrade, Inc.'s affiliate, Amerivest Investment Management, LLC, an investment adviser registered with the SEC ("Amerivest"), dated December 1, 2011 (the "Agreement").

Under the Agreement, Amerivest provides an internet asset allocation service ("Service") as a sub-adviser to FSS. FSS uses the Service as a tool in making investment decisions for its clients that have established TD Ameritrade ASA Accounts ("ASA Accounts"). The Service provides asset allocation

recommendations, generally in the form of Exchange Traded Funds (“ETFs”) that are based upon the application of Amerivest’s computer-based models to specific categories of information that FSS provides to Amerivest regarding the Client. This information may not include all of the Client’s individual financial circumstances that FSS considers when making investment decisions for the Client and the Service recommendations may not be consistent with the Client’s financial situation or goals, including those which may have been provided to TD Ameritrade, Inc. with respect to its accounts at TD Ameritrade, Inc. FSS makes the final investment decisions and suitability determinations with respect to investments for its Clients’ accounts and neither Amerivest nor TD Ameritrade, Inc. assumes any responsibility for FSS’ investment decisions or the suitability of the investments for FSS’ Clients.

TD Ameritrade, Inc. will not charge commissions on transactions in ETFs in FSS’ Client’s ASA Accounts, including transactions to liquidate positions transferred into such accounts.

FSS pays Amerivest an annual sub-advisory fee, payable quarterly, for this Service. The fee is based on the amount of Client assets that FSS places or commits to place in the Service, net of withdrawals. Client assets that are “plan assets” of plans subject to Title I of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), or of a plan as defined in Section 4975 of the Internal Revenue Code will be excluded from the determination of the level of Client assets in the Service for the purpose of the fee computation.

The basic fee to FSS for the Service is 30 basis points per year for each client account. There is a \$25,000 minimum asset requirement per Client account. The basic fees are reduced when FSS places or commits to place more Client assets in the Service. The basic fee is reduced for all Client accounts when FSS places or commits to place \$1 million or more of Client assets in the Service and is reduced further when FSS places or commits to place \$5 million or more of Client assets in the Service. If FSS places or commits to place \$1 million to \$4,999,999.99 of Client assets in the Service, FSS will have the annual fee reduced to 25 basis points. If FSS commits to place such amount but in fact does not within ninety (90) days, FSS will be charged at the basic rate. Similarly, if FSS places or commits to place \$5 million or more of client assets in the Service, FSS will have the annual fee reduced to 20 basis points. If FSS commits to place such amount but in fact does not within ninety (90) days, FSS will be charged at the rate applicable to \$1 million or more if that level is reached or, if not, at the basic rate. The actual amount FSS pays will be based on the market value of client assets in the Service on the last day of each calendar quarter multiplied by one fourth of the applicable fees.

FSS determines the amount of the investment management fees it charges to Clients. FSS may include the amount of fees it pays to Amerivest for the Service in the fees it charges and may or may not pass on to Clients any fee reduction FSS receives in connection with the Service. Although FSS currently believes that the TD Ameritrade Clearing, Inc. custody and TD Ameritrade, Inc. brokerage services and the

Amerivest sub-advisory Service are competitive in the marketplace for similar services offered by other broker-dealers, custodians and advisers, the Agreement with Amerivest and the fee structure for it as described herein for the Amerivest Service may affect FSS' independent judgment in selecting or maintaining TD Ameritrade, Inc. as the broker or custodian for client accounts and Amerivest as sub-adviser.

## **2. *Brokerage for Client Referrals***

FSS receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

FSS will allow clients to direct brokerage. FSS may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage FSS may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

FSS maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing FSS the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least monthly by Steven Marcus. Steven Marcus is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at FSS are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Steven Marcus. There is only one level of review and that is the total review conducted to create the financial plan.

## **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

## **C. Content and Frequency of Regular Reports Provided to Clients**

Each client receives monthly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian. Clients also receive a copy of every trade placed on behalf of the client on a daily basis. Client can request reports from FSS at no additional cost.

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

## **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

FSS participates in Amerivest sub-advisory service, the TD Ameritrade's institutional customer program and FSS may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between FSS' participation in the program and the investment advice it gives to its Clients, although FSS receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services provided without cost or at a discount: receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FSS' participants; access to block trading which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts; the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FSS or by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by FSS' related persons. Some of the products and services made available by TD Ameritrade through the program may benefit FSS but may not benefit its Client accounts. These products or services may assist FSS in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help FSS manage and further develop its business enterprise. The benefits received by FSS or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, FSS

Form ADV 2A Version: 3/23/2012



endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FSS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the FSS' choice of TD Ameritrade for custody and brokerage services.

### **B. Compensation to Non - Advisory Personnel for Client Referrals**

FSS may compensate individuals or companies for client referrals with a fee share based on a sliding scale, with the largest percentage paid in the first year. The client does not bear the cost of this transaction.

## **Item 15: Custody**

FSS, with client written authority, has limited custody of client's assets through direct fee deduction of FSS's Fees only. FSS will send monthly reports to TD Ameritrade with the calculated fee to be withdrawn directly from client accounts. FSS would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

For those client accounts where FSS provides ongoing supervision, the client has given FSS written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides FSS discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

FSS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

FSS does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither FSS nor its management have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

FSS has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

FSS currently has two management persons/executive officers; Jay L. Marmer and Steven E. Marcus. Their education and business background can be found on the Supplemental ADV Part 2B form.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Jay L. Marmer and Steven E. Marcus's other business activities can be found on the Supplemental ADV Part 2B form.

### **C. How Performance Based Fees are Calculated and Degree of Risk to Clients**

FSS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at FSS or FSS has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither FSS, nor its management persons, has any relationship or arrangement with issuers of securities.