

Item 1 Cover Page

ARS INVESTMENT MANAGEMENT, LLC

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Form ADV Part 2A, Firm Brochure March 30, 2018

This Brochure provides information about the qualifications and business practices of ARS Investment Management, LLC (in this Brochure, we refer to ARS Investment Management, LLC as ARS Investment Management, LLC or the Firm). If you have any questions about the contents of this brochure, please contact:

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The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC), the Massachusetts Securities Division or any other securities regulatory authority.

ARS Investment Management, LLC is registered as an investment adviser with the Securities Exchange Commission pursuant to Investment Advisers Act of 1940, Section 203-1.

Additional information about ARS Investment Management, LLC is available on the website of the SEC at: www.adviserinfo.sec.gov.

Item 2: Material Changes

Effective September 2017, ARS changed the investment strategy and name of the Alpha Risk Hedged Dividend Equity Fund to the Alpha Risk Tactical Rotation Fund Institutional Class (“ARSAX”). The fund’s new investment strategy now focusses on a rules based, risk managed, sector rotation approach while the fund’s investment objective remains the same:

The Fund seeks to achieve total return through a combination of capital appreciation and current income.

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Item 4: Advisory Business

A. Description of ARS Investment Management, LLC

ARS Investment Management, LLC was formed as a limited liability company pursuant to the General Laws Massachusetts Chapter 156C (Massachusetts Limited Liability Act) on July 21, 2015. The Firm became an investment adviser with the Securities Exchange Commission on July 7, 2016. The Firm is managed by Timothy W. Dolan, its Managing Principal.

B. Types of Advisory Services Offered

The Firm provides the following types of advisory services:

1. Portfolio management for individuals and/or small businesses;
2. Selection of other advisers including private fund managers.
3. Sub-advisor for the Alpha Risk Tactical Rotation Fund Institutional Class (“ARSAX”).

Advisory Services may be provided by employing a separately management account (“SMA”) program. Advisory Clients that participate in ARS Investment Management, LLC’s SMA Program are considered advisory clients of the Firm. The Firm provides portfolio management for investment companies. The Firm provides portfolio management for “business development companies” that have made an election pursuant to Section 54 of the Investment Company Act of 1940. The Firm will be providing these services pursuant to an Investment Advisory Contract to an Investment Company registered under the Investment Company Act of 1940 for the Alpha Risk Tactical Rotation Fund Institutional Class (“ARSAX”).

C. Tailoring Services to Needs of Advisory Clients

To the fullest extent possible, the services of the Firm are tailored to the needs of each of its advisory clients. In order to determine a suitable course of action for an advisory client, the Firm will perform a review of each advisory client’s financial circumstances and other factors that may influence the investment recommendations that the Firm may make from time to time. Such review may include, but are not necessarily limited to, advisory client investment objectives, consideration of an advisory client’s overall financial condition, advisory client’s income and tax status, advisory client’s risk profile, and any other potential factor unique to an advisory client’s particular circumstances. In making any investment recommendations, the Firm will rely on a data gathering document or other questionnaire that an advisory

client will be required to complete in order to open an advisory account. Advisory clients of the Firm are required to execute an Advisory Agreement with the Firm at the commencement of an advisory relationship.

D. Wrap Fee Programs

The Firm does not offer or participate in any wrap fee programs at this time

E. Managing Assets using Discretion

The Firm will have discretionary authority over advisory client funds or securities. The Firm exercises investment discretion with respect to an advisory client account if, directly or indirectly, the Firm:

- a. Is authorized to determine what securities or other property shall be purchased or sold for the account; or
- b. Makes decisions as to what securities or other property shall be purchased or sold by or for the account even though some other person (including the advisory client) may have responsibility for those investment decisions.

As a discretionary investment adviser, the Firm will have the authority to supervise and direct an advisory client's SMA Portfolio without consultation with the advisory client. The firm also has trading discretion on the Alpha Risk Tactical Rotation Fund Institutional Class ("ARSAX").

The Firm utilizes an asset allocation model methodology sector rotation strategy (the "Alpha Risk Solutions Sector Rotation Strategy" i.e. ARS Strategy) to guide its investment decisions. The firm also works with other model providers as part of their Tactical Rotation strategy. The ARS Strategy can be applied to different asset classes. The ARS Strategy is an algorithmic model designed to evaluate variations in price and volatility of Exchange Traded Funds ("ETF's"). The algorithmic process determines the weekly or monthly model selection process.

Item 5: Fees and Compensation

A. Fees Charged for Advisory Services

Fees for advisory services are negotiable. The Firm will generally charge advisory client's participating in the SMA Program in accordance with the following fee schedule:

- a. Asset Level less than or equal to \$100,000,000 Fee = 60 Basis Points (0.60%)
- b. Asset Level greater than \$100,000,000 Fee = 55 Basis Points (0.55%)

Fees for advisory services anticipated to be provided to investment companies as well as “business development companies” that have made an election pursuant to Section 54 of the Investment Company Act of 1940 are negotiable and will be memorialized via an executed Investment Advisory Contract.

The Investment Advisory fee for the Alpha Risk Tactical Rotation Fund Institutional Class (“ARSAX”) is 1.10 %. The fee shall be calculated as of the last business day of each month based upon the average daily net assets of the determined in the manner described in the fund’s prospectus and statement of additional information.

B. Payment of Fees

Advisory client’s participating in the SMA Program are billed advisory fees, in arrears, based on the average daily balance of the advisory account for the previous month. The frequency with which the SMA Program is billing is agreed to by mutual consent of the Firm and the client participating in the SMA Program.

The Alpha Risk Tactical Rotation Fund Institutional Class (“ARSAX”) pay its fees in arrears based upon assets under management.

C. Other Fees Paid by Advisory Clients

In addition to the advisory fees described above, advisory clients may incur additional fees and expenses, including but not limited to (1) commissions, brokerage fees or similar transaction charges that may be incurred in connection with executing trades in securities, (2) custodial, administrative, accounting, legal and other fees that may be charged by other unaffiliated financial intermediaries and service providers, and (3) any sales or other taxes that may be assessed.

D. Proration of Fees

The Firm’s advisory clients are not required to prepay any fees for advisory services. Advisory client’s participating in the SMA Program are billed advisory fees in arrears and the fund is billed in arrears for management fees. If an advisory client’s SMA account is closed before the end of the client’s billing cycle, the Firm will pro-rate the advisory fee to the number of days the account was open during the billing period.

E. Compensation for Sales of Securities

The Firm may execute transactions in securities for its advisory clients. Neither the Firm nor any of its “advisory affiliates” and “related persons” receives any other compensation for providing advisory services other than the fees discussed in Item 5A above.

Item 6: Performance Based Fees and Side by Side Management

The Firm does not charge any performance based fees for providing advisory services. Neither the Firm nor any of its “advisory affiliates” and “related persons” receives any other compensation for providing advisory services other than the fees discussed in Item 5A above.

“Side-by-Side Management” refers to a situation in which the same advisory firm manages multiple accounts with differing structures (e.g. registered investment company, hedge fund, institutional account, SMA account). The Firm currently does not provide advisory services to any account structures other than registered investment company or SMA. Those registered investment company or SMA accounts are assessed fees in accordance with the advisory fee schedule referenced in Item 5A. The firm provides advisory services to 1940 SEC Act mutual funds and SMAs.

Item 7: Types of Advisory Clients

The firm currently advises a mutual fund. The Firm’s advisory clients will be generally comprised of many types of account types. Advisory clients can include individuals, high net worth individuals, accredited investors, trusts, institutions, pension plans, broker-dealers, advisers and investment companies. The Firm will use reasonable diligence, in regard to the opening and maintenance of every advisory client account and retains the essential facts concerning an advisory client’s authorization related to the authority of each person acting on behalf of the advisory client. Facts essential to determining the authority of each person acting on behalf of an advisory client are those required to (1) effectively service the advisory client’s account, (2) act in accordance with any special handling instructions for the advisory client’s account, and (3) understand the authority of each person acting on behalf of the advisory client. The Firm’s advisory clients are required to execute an Advisory Client Questionnaire and Advisory Contract that will require the advisory client to provide at a minimum the following information:

1. Advisory Client Basic Identifying Data (Individual or Entity);
2. Advisory Client Name;
3. Advisory Client Address;
4. Advisory Client Contact Phone Number;
5. Advisory client Email;
6. Advisory Client Age (Individual) or Incorporation Date (Entity);

7. Advisory Client Other Investments;
8. Advisory Client Financial Situation and needs;
9. Advisory Client Social Security Number (Individual) or Tax ID Number (Entity);Advisory Client Tax Status;
10. Advisory Client Investment Objectives, Investment Experience, Investment Time Horizon, Liquidity Needs, Risk Tolerance;
11. Any other information the Advisory client may disclose relevant to the administration of the advisory client account.

The Firm's advisory clients will be required to establish their SMA accounts on a qualified SMA platform of their choice. The SMA account is in the advisory client's name and totally under the advisory client's control. The Firm will assist the advisory client in opening their SMA account on a qualified SMA platform. Advisory clients will give the Firm "discretionary authority" to trade their SMA account on their behalf.

The discretionary authority remains in place until cancelled by the advisory client or an authorized representative of the advisory client. Advisory clients maintain complete access to their accounts and have separate login credentials to review the status of all trades, cash positions, deposits or withdrawals.

The Firm does not have a minimum account size requirement for its advisory clients', however it is suggested that the minimum for SMA accounts is \$25,000 and the minimum for mutual funds is \$1000

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

A. Methods of Analysis

The Firm utilizes an asset allocation model methodology (the "Alpha Risk Solutions Sector Rotation Strategy", i.e. "ARS Strategies") to guide its investment decisions. The ARS Strategies can be applied to different asset classes and investment strategies. The ARS Strategies are specially designed for investors looking for ways to make their level of risk adjusted return as effective as possible. The ARS Strategies use a proprietary rules-based engine that provides users with clearly defined "buy and sell" signals for optimizing the impact of tactical decision-making. The ARS Strategies are based on algorithmic models designed to evaluate variations in price and volatility of Exchange Traded Funds ("ETF's") and applies rules-based algorithmic engines to issue buy and sell signals across a broad mix of ETFs. The ARS Strategies can be employed utilizing any number of ETF fund families. The algorithmic processes determine the weekly, monthly or quarterly model selection process. The ARS Strategies are generally based on sector rotation strategies that seek to provide downside protection in falling markets and upside participation in rising markets. The ARS Strategies utilize clearly defined portfolio construction rules and a proprietary quantitative

model for investment decision-making in various ETFs. The critical process, executed on a quarterly, monthly or weekly cycle within each asset class is the model's decision to include or exclude each of the asset class, economic sector, or geographic region-based ETFs. The decisions are generated through a sophisticated analytical engine that evaluates volatility and price trends. This output is a binary decision. The binary decision is a choice between two alternatives, for instance between taking some specific action or not taking it. If an asset class receives a positive signal for investing, it is included. If an asset class receives a negative signal, it is removed. The algorithm supporting the ARS Strategies is designed to address risk while providing exposure to normal, rising markets. The ARS Strategies have the flexibility to reduce asset class risk on an incremental basis or to reposition more dramatically, partly or wholly to a cash alternative ETF if suggested by the model results.

B. Investment Strategies Used

The Firm employs three (3) Investment Strategies:

Strategy One: The ARS Sector Rotation Strategy algorithmic process is applied in a core set of asset classes representing a comprehensive snapshot of America's economic sectors and employs a systematic approach to investing. The sectors employed by the ARS Sector Rotation Strategy are comprised of (1) financials, (2) consumer discretionary, (3) consumer staples, (4) utilities, (5) energy, (6) health care, (7) industrials, (8) materials, and (9) technology. The implementation of the ARS Sector Rotation Strategy may vary based on the advisory client's investment objectives or specialized customization requested by the advisory client. The disciplined business cycle approach to sector allocation is designed to help advisory clients optimize their portfolio returns. While the algorithmic process is sophisticated, the output of the ARS Sector Rotation Strategy consists of one of two simple binary signals (1 to Buy or 0 to Sell). If at any time fewer than four sector ETFs are generating a "Buy" signal, assets are deployed to a cash alternative ETF. By signaling "1 to Buy" or "0 to Sell" the ARS Strategies are designed to deploy a portfolio allocation that (1) tilts towards the market sectors that are currently the most attractive, (2) steer clear of those sectors that display "red flags", (3) ride out small storms by holding fast to those market sectors that show the most promise, and (4) exit those market sectors when indicators signal the potential for extremely negative market conditions.

Strategy Two: The ARS/ WealthShield Focused Tactical Sector Strategy (the "Strategy") is designed to participate in U.S equity market growth while protecting against market downturns. The Strategy attempts to replicate the tactical performance of combining the SPDJ Alpha Risk Solutions Sector Rotation Index and the SolActive WealthShield Sector Index.

The Strategy/ Index invests in liquid U.S sector and subsector ETFs, or U.S Government bond ETFs based on a simple rules-based process (the “System”). If the System suggests a risk-on environment, U.S sector and subsector ETFs are ranked and the top 5 sectors are selected based on historical momentum. Only the sectors that are in positive trends make it into the current Strategy/ Index allocation. If a sector is in a negative trend, then the Strategy/ Index is invested in short-term U.S Government bond ETFs. When the System indicates a risk-off atmosphere the Strategy/ Index invests in Intermediate to Long-term U.S Government bond ETFs.

Strategy Three: ARS Tactical Dividend Growth – the ‘Strategy’ is designed to provide tactical exposure to generally large cap, dividend paying, growth stocks. The strategy utilizes several tactical index inputs to determine which equity securities are consistent performers, attractively priced and exhibit the required growth and risk characteristics to be included in the portfolio. The strategy can invest in both domestic and/ or international securities.

C. Risk of Loss

All investments in securities include a risk of loss that investors should be prepared to bear. The principal risks of the ARS Sector Rotation Strategy and the Dividend Growth Strategy are as follows:

ETF Risk: The risk that the value of an ETF in which the ARS Strategies invests will be more volatile than the underlying portfolio of securities the ETF is designed to track, or that the costs of owning shares of the ETF will exceed those an investor would incur by investing in such securities directly.

Market Risk: The risk that the value of the securities in which the ARS Strategies may invest may drop in reaction to events and conditions, independent of a security’s particular underlying circumstances. For example, political, economic, and social conditions may cause a change in the value of the securities. Price changes may be temporary or may last for extended periods.

Equity Securities Risk: The risk that events or circumstances at a particular industry, or a particular company within an industry will impact the value of the stocks and ETFs held by the ARS Strategies and thus, the value of an investment over short or extended periods.

Interest-Rate Risk: The risk that fluctuations in interest rates may cause investment prices to fluctuate and impact the value of fixed income securities or interest rate sensitive ETFs held by the ARS Strategies. For example, when interest rates rise, yields on existing bonds become less attractive causing their market values to decline.

Credit Risk: The risk that a fixed income security issuer will fail to pay interest and principal in a timely manner or that negative perceptions of the issuer’s ability to make such payments will cause the price of

that fixed income security to decline.

Sector Concentration Risk: The risk that events negatively affecting an industry or market sector in which the ARS Strategies may invest will cause the overall value of the ARS Strategies to decline. To the extent that the ARS Strategies may invest significant portions of its portfolio in ETFs representing particular markets or sectors (such as Energy, Healthcare, Technology, etc.) or in an ETF representing U.S. Treasuries, the ARS Strategies are more vulnerable to conditions that negatively affect such sectors as compared to an investment strategy that is not significantly invested in such sectors.

Turnover Risk: The risk that frequent trading will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains or losses that can negatively impact an investor's overall investment as compared to investments in strategies with low turnover.

U.S. Government Securities Risk: The risk that U.S. Government securities in in ETFs utilized by the ARS Strategies will be subject to price fluctuations, or that an agency or instrumentality will default on an obligation not backed by the full faith and credit of the United States.

Derivative Securities Risk: The Mutual Funds, Separately Managed Account Portfolios and other Funds managed by ARS may use derivative instruments, which derive their value from the value of an underlying security, currency, or index. Moreover, derivative instruments involve risks different from direct investments in the underlying assets such as the fact that the transactions may result in losses of all or in excess of any gain in the portfolio positions.

Quantitative Risk: The risk that the effectiveness of the quantitative model used for the ARS Strategies can dissipate over time as similar Strategies are adopted and as the market becomes more efficiently priced.

Input Data Risk: The risk that the information and data supplied by third party vendors ("Data") is subject to input and quality errors. The ARS Strategies' quantitative models depend on the accuracy and reliability of Data supplied by third party vendors, and the quantitative models may not function properly if Data proves to be incorrect or incomplete, or is input incorrectly.

Programming /Modeling Risk: The ARS Strategies' research and modeling processes are extremely complex and the results of that process must then be translated into computer code. Although quantitative model providers seek to hire individuals skilled in each of these functions and to provide appropriate levels of oversight, the complexity of the individual tasks, the difficulty of integrating such tasks, and the limited ability to perform "real world" testing of the end product raises the chances that the finished model may contain an error; one or more of such errors could adversely affect an advisory client's portfolio.

System Risk: The ARS Strategies rely extensively on computer programs and systems in their proprietary modeling to evaluate securities, to monitor portfolios, and to generate reports that are critical to oversight of its activities. In addition, certain systems are operated by third parties, including counterparties and service providers. ARS Strategies' may not always be in the best position to verify the risks or reliability of such third-party systems. These programs or systems, whether operated by a third party or not, may be subject to certain defects, failures or interruptions, including, but not limited to, those caused by computer "worms," viruses and power failures. Any such defect or failure could have a material adverse effect on the ARS Strategies.

For example, such failures could cause settlement of trades to fail, lead to inaccurate accounting, recording or processing of trades, and cause inaccurate reports, which may affect ARS Strategies' ability to monitor its investment portfolios and its risks.

Operational Risk: ARS has developed systems and procedures to control operational risk. Operational risks arising from mistakes made in the trading confirmation or settlement of transactions, from transactions not being properly booked, evaluated or accounted for or other similar disruption in ARS's operations may cause ARS Strategies to suffer financial loss; the disruption of its business; liability to advisory clients or third parties; regulatory intervention; or reputational damage. ARS relies heavily on its financial, accounting and other data processing systems.

Item 9: Disciplinary Information

All of the following are considered management persons of the Firm and have the power to exercise, directly or indirectly, a controlling influence over the Firm's management or policies or to determine the general investment advice given to advisory or prospective advisory clients.

1. Principal executive officers, such as chief executive officer, chief financial officer, chief operations officer, chief legal officer, and chief compliance officer;
2. Any directors, general partners, or trustees and other individuals with similar status or performing similar functions;
3. Any individuals who determine general investment advice provided to advisory clients.

A. Judicial Proceedings

Neither the Firm, nor any of its management persons have been involved in any material judicial proceedings that involve the integrity of the Firm's management personnel or that are material to an actual or prospective advisory client's evaluation of the Firm's advisory services.

B. Administrative Proceedings

Neither the Firm, nor any of its management persons have been involved in any material administrative proceedings that involve the integrity of the Firm's management personnel or that are material to an actual or prospective advisory client's evaluation of the Firm's advisory services.

C: Self-Regulatory Organization (“SRO”) Proceedings

Neither the Firm, nor any of its management persons have been involved in any material SRO proceedings that involve the integrity of the Firm's management personnel or that are material to an actual or prospective advisory client's evaluation of the Firm's advisory services.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-Dealer

The Firm is not registered, and has not applied to be registered with the SEC or any state, as a broker-dealer. The Managing Principal, Timothy W. Dolan is registered as a securities representative, principal and designated OSJ of Compass Securities Corporation, a registered broker-dealer based in Braintree, Massachusetts. The Managing Director Charles E Petrie is registered as a securities representative of Compass Securities Corporation based in Braintree, Massachusetts

B. Futures Commission Merchant

Neither the Firm nor any Management Person is registered or has applied to be registered as a futures commission merchant or an associated person of any futures commission merchant.

C. Commodity Pool Operator

Neither the Firm nor any Management Person is registered or has applied to be registered as a commodity pool operator or an associated person of any commodity pool operator.

D. Commodity Trading Advisor

Neither the Firm nor any Management Person is registered or has applied to be registered as a commodity trading advisor or an associated person of any commodity trading advisor.

E. Related Persons

The Firm and some of its "advisory affiliates" and "related persons" perform similar functions with Dolan Capital Group, LLC. Dolan Capital Group, LLC is registered as an Investment Advisor pursuant to the General Laws of Massachusetts: Chapter 110A (Uniform Securities Act). The Firm addresses any potential conflicts of interest by disclosing it to advisory clients in this brochure. The Firm encourages any advisory or potential advisory client to request any additional information related to potential conflicts of interest as part of their respective "due diligence process." The Firm is committed to being transparent as it relates to any potential conflicts of interest. As a matter of policy, the Firm aggressively discourages activities that

put advisory or potential advisory client's interests anywhere but first. Additionally, the Firm has instituted a comprehensive supervisory process that is designed to address among other things, potential conflicts of interest such as the relationship between the Firm and Dolan Capital Group, LLC.

F. Recommendations and Selections of Other Investment Advisers

As of the date of this brochure, the Firm has not made any recommendations or selections of other investment advisers for its advisory clients, but is something that it may do.

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

A. Code of Ethics

The Firm has adopted a Code of Ethics ("the Code"), the full text of which is available to advisory clients upon request. The Firm's Code has several goals. First, the Code is designed to assist the Firm in complying with applicable laws and regulations governing its investment advisory business. The Firm owes fiduciary duties to its advisory clients. Pursuant to these fiduciary duties, the Code requires the Firm's associated persons to act with honesty, good faith and fair dealing in working with advisory clients. In addition, the Code prohibits associated persons from trading or otherwise acting on insider information. Next, the Code sets forth guidelines for professional standards for the Firm's associated persons. Under the Code's Professional Standards, the Firm expects its associated persons to put the interests of its advisory clients first, ahead of personal interests. In this regard, the Firm's associated persons are not to take inappropriate advantage of their positions in relation to the Firm's advisory clients.

B. Principal Trades with Advisory Clients

The Firm does not engage in any principal trading with any advisory clients. The Firm does not provide any trade execution services for its advisory clients.

C. Conflicts of Interest in Securities Transactions

The Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time the Firm's associated persons may invest in the same securities recommended to advisory clients. Under its Code, the Firm has adopted procedures designed to reduce or eliminate conflicts of

interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage advisory clients. The Code also provides for

disciplinary action as appropriate for violations. Because associated persons may invest in the same securities as those purchased in advisory client accounts, the Firm has established a policy requiring its associated persons to pre-clear transactions in certain of these securities with the Chief Compliance Officer. The goal of this policy is to avoid any conflict of interest that may present itself in these situations. Certain securities, such as CD's, treasury obligations and open-end mutual funds are exempt from this pre-clearance requirement. However, in the event of other identified potential trading conflicts of interest, the Firm's goal is to always place advisory client interests first.

D. Conflicts of Interest in Contemporaneous Transactions

The Firm does not maintain any firm securities inventory positions and thus does not engage in any contemporaneous securities transactions with advisory clients. Associated persons who maintain advisory accounts with the Firm are utilizing the same asset allocation model methodology (the "ARS Strategies") as other advisory clients. When an account rebalancing is performed associated person, accounts will be rebalanced utilizing the same asset allocation methodology that is employed with non- associated person advisory accounts.

Item 12: Brokerage Practices

The Firm does not provide securities trade execution services for advisory clients. Brokerage practices are not applicable with respect to the ARS Strategies. The Firm's advisory clients will be required to establish their SMA accounts on a qualified SMA platform of their choice. The SMA account is in the advisory client's name and totally under the advisory client's control. The Firm will assist the advisory client in opening their SMA account on a qualified SMA platform. Advisory clients will give the Firm "discretionary authority" to trade their SMA account on their behalf. The Firm does not receive research or other products or services from any SMA platform manager or broker-dealer. The Firm does not recommend, request or require that an advisory client direct it to execute any transactions through any specific broker-dealer nor does it permit an advisory client to direct any securities execution or other brokerage services.

ARS manages the Alpha Risk Tactical Rotation Fund Institutional Class ("ARSAX"), which has its account set up at Weeden & Company and Interactive Brokers. ARS has trading authority on this account.

Item 13: Review of Accounts

For all the Firm's ARS Strategies, advisory accounts, advisory client questions regarding investment decisions specific to an advisory account are typically handled by Timothy Dolan, Managing Member and Chief Compliance Officer. The Firm utilizes the ARS Strategies, which are asset allocation model methodologies, to

guide its investment decisions. The ARS Strategies can be applied to different asset classes and investment strategies. The ARS Strategies utilize algorithmic models designed to evaluate variations in price and volatility of ETFs and applies a rules-based engine to issue buy and sell signals across a broad mix of ETFs. The ARS Strategies algorithmic processes can run weekly, monthly or quarterly and determines the weekly, monthly or quarterly model selection process. If the ARS Strategies indicates that a rebalancing is appropriate, the advisory accounts employing the ARS Strategies will be rebalanced accordingly. Mr. Dolan and Charles Petrie will ensure that any rebalancing of the Firm's advisory client accounts employing the ARS strategies is performed properly and properly reflects the employment of the ARS strategies. Mr. Dolan will work with any advisory client and its SMA platform manager to ensure that any advisory account discrepancies are properly resolved in a timely manner.

Advisory account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms.

Events that may trigger further advisory client account reviews in addition to the standard review process may include, but are not limited to, the performance of an individual advisory account being an outlier to the performance of advisory accounts with similar investment objectives, the asset allocation of an individual advisory account being an outlier to the recommended percentages for advisory accounts with similar investment objectives, and deposits or withdrawals occurring in an advisory account. Other factors may include advisory client complaints, requests by an advisory client to effect transactions in their account(s) where such transactions may appear to be inconsistent with the advisory client's previously stated investment objectives or known changes in general advisory client circumstances (marriage, divorce, retirement).

Item 14: Advisory Client Referrals and Other Compensation

A. Payments for Referrals

The Firm may on occasion pay third parties for providing advisory or other client referrals.

B. Other Compensation

Neither the Firm nor any associated person of the Firm, Alpha Risk Solutions, LLC or any other Firm

advisory affiliate receive any economic benefit, including sales awards or prizes, from any third party for providing advisory services to advisory clients.

ARS receives a management fee net, after the fund expense limitation agreement, for the Alpha Risk Tactical Rotation Fund Institutional Class (“ARSAX”)

Item 15: Custody

The Firm does not maintain custody of advisory client assets or securities. The respective advisory client’s SMA platform manager is responsible for the custody of advisory client assets. With the agreement of the advisory client, the Firm can instruct the SMA platform manager to deduct any advisory fees owed to the Firm. The SMA platform manager is responsible for sending quarterly account statements directly to advisory clients. Advisory clients are urged to carefully review those statements.

Item 16: Investment Discretion

The Firm will have discretionary authority over advisory client funds or securities. The Firm exercises investment discretion with respect to an advisory client account if, directly or indirectly, the Firm:

- a. Is authorized to determine what securities or other property shall be purchased or sold for the account; or
- b. Makes decisions as to what securities or other property shall be purchased or sold by or for the account even though some other person (including the advisory client) may have responsibility for those investment decisions.

As a discretionary investment adviser, the Firm will have the authority to supervise and direct an advisory client’s SMA Portfolio without consultation with the advisory client.

Item 17: Voting Advisory Client Securities

Advisory clients are encouraged to contact their SMA platform manager with any questions related to proxies and solicitations. If advisory clients need further assistance with any proxies received they may contact Mr. Timothy Dolan, Managing Partner.

ARS Investment Management, LLC (“ARS”) has adopted Proxy Voting Policies and Procedures (“Proxy Voting Policies”) that provide that proxies on portfolio securities will be voted for the exclusive benefit, and in the best economic interest of the Fund’s shareholders, as determined by ARS, in good faith, subject to any restrictions or directions of the Fund. Such voting responsibilities will be exercised in a

manner that is consistent with the general antifraud provisions of the Investment Advisors Act of 1940, as well as ARS' fiduciary duties under the federal and state law to act in the best interest of its clients. The Board of Trustees of the Funds has approved the Proxy Voting Policies.

On certain routine proposals (such as those which do not change the structures, bylaws or operations of a company), ARS will generally vote in the manner recommended by management. Non-routine proposals (such as those affecting corporate governance, compensation and other corporate events) and shareholder proposals will generally be reviewed on a case-by-case basis. An investment analyst/portfolio manager will review each such proposal and decide how the proxy will be voted. With respect to all non-routine proposals and shareholder proposals, if a decision is made to consider voting in a manner other than that recommended by management, the analyst/portfolio manager will make a recommendation to the Chief Investment Officer, who will make the final determination as to how to vote the proxy in the best economic interests of the client.

In certain circumstances where, for example, restrictions on ownership of a particular security beyond the control of ARS make it impossible for ARS to acquire as large a position in that security as it determines is in the best interests of its clients, ARS may, from time to time, enter into a voting agreement with an issuer of securities held in the account of a client which provides that the issuer will vote certain of the issuer's proxies. ARS will enter into such voting agreements only when it determines that it is in the best interests of the client to do so. Any such voting agreement will provide that any shares subject to the agreement be voted by the issuer in a manner that mirrors the votes cast on such matter by all other shareholders.

If ARS determines that voting a particular proxy would create a conflict of interest between the interests of a Fund and its shareholders on the one hand, and ARS's own interests, the interests of the Funds' distributor, or the interests of an affiliated person of the Funds, ARS, or the Funds' distributor on the other hand, ARS will either (i) disclose such conflict of interest to the Corporate Governance Committee of the Board of Trustees and obtain the consent of the committee before voting the proxy; (ii) vote such proxy based upon the recommendations of an independent third party such as a proxy voting service; or (iii) delegate the responsibility for voting the particular proxy to the Corporate Governance Committee of the Board of Trustees.

Item 18: Financial Information

The Firm does not require or solicit the prepayment of any advisory fees. The Firm does not have any financial condition that is reasonably likely to impair the Firm's ability to meet contractual commitments to advisory clients.

Item 19: Requirements for State Registered Advisers

A. Principal Executive Officers and Management Persons

The identity, education and business background of the Firm's executive officers and management persons is as follows:

Timothy W. Dolan, Managing Principal, Chief Compliance Officer

Mr. Dolan formed the Firm on July 21, 2015 and has served as its Managing Principal and Chief Compliance Officer since that date. Mr. Dolan formed Dolan Capital Group, LLC in December 2009 and has served as its Managing Principal and Chief Compliance Officer since that date. From June 2008 until forming Dolan Capital Group, LLC in December 2009, Mr. Dolan acted as an independent consultant. From August 1995 until June 2008, Mr. Dolan served as a Senior Vice President and Division Manager for Fidelity Investments Institutional Services Co., Inc. His responsibilities included institutional and retail sales, where he led a team of 16 professionals covering the broker dealer, investment adviser, RIA, bank, insurance, regional broker-dealer, independent and offshore channels. Mr. Dolan was directly responsible for the division's field sales personnel, business and territory development, complex and regional sales relationships as well as retirement plans sales. He also gained extensive experience in new product development and marketing throughout his career. Prior to his senior management responsibilities at Fidelity, Mr. Dolan spent 15 years wholesaling mutual funds, fixed & variable annuities, and retirement plans for investment management firms, including Fidelity Investments, GT Global and MFS. He received his B.S. and MBA from Babson College, Wellesley, Massachusetts and is a graduate of the Securities Industry Association Institute at the University of Pennsylvania, Wharton School of Business. Since January 2016, Mr. Dolan has been registered through the Financial Industry Regulatory Authority (FINRA) with Compass Securities Corporation as a General Securities Representative (Series 7), General Securities Principal (Series 24) and Municipal Fund Principal (Series 51). He is also registered as a securities agent of Compass Securities Corporation, with the Commonwealth of Massachusetts and State of New York and has taken and passed the state securities agent examination (Series 63) and the state investment adviser representative examination (Series 65).

Charles Edward Petrie, Managing Director

Mr. Petrie joined the firm in July of 2016 as a Managing Director. Mr. Petrie joined Dolan Capital Group in 2015 as a registered broker. Mr. Petrie also runs his own consulting firm, Petrie Consulting where he advises firms on mutual funds and third party administrative services. From 2014 to 2015 he was with MSC-BD in Raleigh North Carolina as an independent consultant and from October 2012 until October 2014 he was with Zega Financial in Ellicott City Maryland. Mr. Petrie has a B.S in Business Administration

from Emmanuel College in Boston Massachusetts.

Since January 2016, Mr. Petrie has been registered through the Financial Industry Regulatory Authority (FINRA) with Compass Securities Corporation as a General Securities Representative (Series 7), He is also registered as a securities agent of Compass Securities Corporation, with the Commonwealth of Massachusetts and has taken and passed the state securities agent examination (Series 63) and the state investment adviser representative examination (Series 65).

Clint Sorenson, Chief Investment Officer

Mr. Sorenson joined the firm in January 2017 as an outsourced Chief Investment Officer. He will be working on trading models and providing investment advice to ARS. In December 2013, Mr. Sorenson started Emerald Investment Partners, LLC in Raleigh, NC. Mr. Sorenson has developed and currently manages proprietary quantitative strategies by fusing together behavioral finance, fundamental and technical analysis. He is a Chartered Market Technician and Chartered Financial Analyst and is proficient in a broad range of investment topics. Before becoming a founding partner of Emerald Investment Partners, LLC, Clint was a financial consultant at Gunnet, Best & Sorenson Financial Group of Wells Fargo Advisors. He earned his bachelor's degree from the University of North Carolina-Chapel Hill. Clint is also a board member and current President of the CFA Society North Carolina.

B. Non-Advisory Business Specialty Index Provider Service

Alpha Risk Solutions, LLC ("Alpha Risk") is a Data Modeling and Research affiliate of the Firm and has developed and licensed the Alpha Risk Solutions Sector Rotation Index ("Index"). The Index can be applied to domestic, U.S. core equity assets. The Index is driven by an algorithmic model designed to evaluate variations in price and volatility of Exchange Traded Funds. The algorithmic process determines the weekly, monthly or quarterly model selection process. The Index is sub-licensed on a subscription basis to unaffiliated third party organizations through the Firm. Neither the Firm nor Alpha Risk is providing advisory services or continuous supervisory services to any unaffiliated third party organizations who utilize the Index.

C. Performance-Based Fee Calculations

As described in Item 5, the Firm is not compensated by performance-based fees.

D. Conflicts of Interest

For a discussion of the Firm's policies related to Conflicts of Interest please see the following sections of this brochure:

Item 10: Other Financial Industries Activates and Affiliations; and

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

E. Additional legal and Disciplinary Events Arbitrations

Neither the Firm nor any Management Person has been involved in an arbitration that resulted in an award against any of those persons in excess of \$2,500 or that found any of such persons liable in an arbitration claim that alleged damages in excess of \$2,500 involving any of the following:

- a. an investment or an investment-related business or activity;
- b. fraud, false statement(s), or omissions;
- c. theft, embezzlement, or other wrongful taking of property;
- d. bribery, forgery, counterfeiting, or extortion; or
- e. dishonest, unfair, or unethical practices.

Civil, Self-Regulatory or Administrative Actions

Neither the Firm nor any Management Person has been involved in an action that resulted in an award or otherwise found such person liable involving any of the following:

- a. an investment or an investment-related business or activity;
- b. fraud, false statement(s), or omissions;
- c. theft, embezzlement, or other wrongful taking of property;
- d. bribery, forgery, counterfeiting, or extortion; or
- e. dishonest, unfair, or unethical practices.

F. Relationships or Arrangements with Securities Issuers

The Firm does not currently have any advisory relationships or any other arrangement with any securities issuers.

ARS Investment Management, LLC

Form ADV Part

2B

Client Brochure Supplement

March 30, 2018

This Brochure Supplement provides information about certain ARS Investment Management, LLC employees listed below that supplements the ARS Investment Management, LLC Brochure you should have received above. Please contact ARS Investment Management, LLC at 617-379-5551 or tdolan@dolancapitalgroup.com if you did not receive ARS Investment Management, LLC's Brochure or if you have any questions about this Brochure Supplement. Additional information about the following persons are available on the SEC's website at www.adviserinfo.sec.gov.

The supplementary information below provided information on the Supervised Persons with the most significant responsibility for the day-to-day advice provided to Clients.

Timothy W. Dolan

ARS Investment Management, LLC 629 Highland Ave, Suite 200 Needham, MA 02494

Phone: 617-379-5551

Website: www.dolancapitalgroup.com

This Supplement provides information about Timothy W. Dolan that supplements the ARS Investment Management Firm Brochure. You should have received a copy of that Brochure. Please contact Timothy Dolan at (617-379-5551, if you did not receive the Firm Brochure or if you have any questions about the contents of this Supplement.

Public information about Mr. Dolan is available on the website of the U.S Securities and Exchange Commission at:

www.adviserinfo.sec.gov.

Information about Mr. Dolan may also be obtained by contacting:

The Commonwealth of Massachusetts Secretary of the Commonwealth Securities Division
One Ashburton Place, 17th Floor Boston, Massachusetts 02108 617-727-3548

ITEM 2: Educational Background and Business Experience

Mr. Dolan formed ARS Investment Management, LLC (or the “Firm”) in July 2015 and has served as its Managing Principal and Chief Compliance Officer since that date. Mr. Dolan also serves as Managing Principal and Chief Compliance Officer of Dolan Capital Group, LLC (“Dolan Capital Group”), an affiliate of the Firm. From June 2008 until forming Dolan Capital Group in December 2009, Mr. Dolan was an independent consultant. From September 1995 until June 2008, Mr. Dolan served as a Senior Vice President and Division Manager for Fidelity Investments Institutional Services Co., Inc. His responsibilities included both institutional and retail sales, where he led a team of 16 professionals covering the broker dealer,

investment adviser, bank, insurance, regional broker-dealer, independent and offshore channels. Mr. Dolan was directly responsible for the division's field sales personnel, business and territory development, complex and regional sales relationships as well as retirement plans sales. He also gained extensive experience in new product development and marketing throughout his career. Prior to his senior management responsibilities at Fidelity, Mr. Dolan spent 15 years wholesaling mutual funds, fixed & variable annuities, and retirement plans for investment management firms, including GT Global and MFS. He received his B.S. and MBA from Babson College, Wellesley, Massachusetts and is a graduate of the Securities Industry Association Institute at the Wharton School, University of Pennsylvania. Mr. Dolan is registered through the Financial Industry Regulatory Authority (FINRA) with Compass Securities Corporation as a General Securities Representative (Series 7), General Securities Principal (Series 24) and Municipal Fund Principal (Series 51). He is registered as a securities agent of Compass Securities Corporation with the Commonwealth of Massachusetts and has taken and passed the state securities agent examination (Series 63) and the state investment adviser representative examination (Series 65).

ITEM 3: Disciplinary Information

There are no legal or disciplinary matters that would-be material to the ability of a Client or prospective Client to evaluate Mr. Dolan. In particular, Mr. Dolan has not been subject to any of the types of matters described below in this Section.

A. Criminal or Civil Actions

Mr. Dolan has never been and is not currently involved in a criminal or civil action in a domestic, foreign or military court, in which Mr. Dolan was:

1. convicted of, pled guilty to, pled nolo contendere to or no contest to, any criminal action;
2. named in a criminal action that is currently pending;
3. found in any action to have violated any investment-related statute or regulation; or
4. the subject of any order, judgment or decree permanently or temporarily enjoining, or otherwise limiting, Mr. Dolan from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. Administrative Proceedings

Mr. Dolan has never been and is not currently involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Dolan was:

1. found to have caused an investment-related business to lose its authorization to do business; or
2. found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
 - (a) denying, suspending, or revoking the authorization of Mr. Dolan to act in an investment-related business;
 - (b) barring or suspending Mr. Dolan from association with an investment-related business;
 - (c) otherwise significantly limiting the investment-related activities of Mr. Dolan;
 - (d) or imposing a civil money penalty of more than \$2,500 on Mr. Dolan.

C. Action by Self-Regulatory Organizations

Mr. Dolan has not been involved in any proceeding before any self-regulatory organization, such as the Financial Industry Regulatory Authority, in which he was:

1. found to have caused an investment-related business to lose its authorization to do business; or
2. found to have been involved in a violation of the organization's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; or (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

D. Other Proceedings

Mr. Dolan has not been involved in any other proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct. Nor has Mr. Dolan ever resigned or otherwise relinquished his attainment, designation, or license in anticipation of such a proceeding.

E. Arbitrations

Mr. Dolan has not been involved in an arbitration that resulted in an award against him in excess of \$2,500 or that found him liable in an arbitration claim that alleged damages in excess of \$2,500 involving any of the following:

1. an investment or an investment-related business or activity;
2. fraud, false statement(s), or omissions;
3. theft, embezzlement, or other wrongful taking of property;
4. bribery, forgery, counterfeiting, or extortion; or
5. dishonest, unfair, or unethical practices.

F. Civil, Self-Regulatory or Administrative Actions

Mr. Dolan has not been involved in an action that resulted in an award or otherwise found him liable involving any of the following:

1. an investment or an investment-related business or activity;
2. fraud, false statement(s), or omissions;
3. theft, embezzlement, or other wrongful taking of property;
4. bribery, forgery, counterfeiting, or extortion; or
5. dishonest, unfair, or unethical practices.

ITEM 4: Other Business Activities

A. Investment Related Activities

Mr. Dolan is registered as a securities representative of Compass Securities Corporation (Compass), a broker-dealer based in Braintree Massachusetts. Mr. Dolan provides services through Compass that are similar to those he provides through the Firm and Dolan Capital, but where his activities involve representing an asset manager that offers its services through mutual funds, hedge funds or otherwise may involve sales of securities. Mr. Dolan's activities through the Firm, Compass and Dolan Capital are his only other investment related business activities or occupation.

B. Other Activities for Compensation

Alpha Risk Solutions is a data provider used as the source of the algorithm sector rotation strategy which is under common ownership with ARS. Mr. Dolan is not involved in any other business activities or occupation for compensation other than those he provides through the Firm, Alpha Risk, Compass or Dolan Capital Group.

ITEM 5: Additional Compensation

No person that is not a Client provides any economic benefit to Mr. Dolan for providing advisory services to Clients.

ITEM 6: Supervision

All employees of the Firm are supervised by Mr. Dolan. As a small firm with limited resources, he is not subject to supervision by any other person. The Firm has adopted policies and procedures reasonably intended to assure that Mr. Dolan and the Firm comply with all applicable statutory and regulatory requirements governing the business of the Firm.

ITEM 7: Requirements for State-Registered Advisers

A. Additional Disciplinary Information

All disciplinary information is described in Item 3, above.

B. Bankruptcy

Mr. Dolan has never been the subject of a bankruptcy petition.

Charles Edward Petrie

ARS Investment Management, LLC 629 Highland Ave, Suite 200 Needham, MA 02494

Phone: 617-379-5551

Website: www.dolancapitalgroup.com

This Supplement provides information about Charles E. Petrie that supplements the ARS Investment Management Firm Brochure. You should have received a copy of that Brochure. Please contact Timothy Dolan at 617-379-5551, if you did not receive the Firm Brochure or if you have any questions about the contents of this Supplement.

Public information about Mr. Petrie is available on the website of the U.S Securities and Exchange Commission at:

www.adviserinfo.sec.gov.

Information about Mr. Petrie may also be obtained by contacting:

The Commonwealth of Massachusetts Secretary of the Commonwealth Securities Division
One Ashburton Place, 17th Floor Boston, Massachusetts 02108 617-727-3548

ITEM 2: Educational Background and Business Experience

Mr. Petrie joined the firm in July of 2016 as a Managing Director and is Head of Distribution. Mr. Petrie also runs his own consulting firm, Petrie Consulting where he advises firms on mutual funds and third party administrative services. From 2014 to 2015 he was with MSC-BD in Raleigh North Carolina as an independent consultant and from October 2012 until October 2014 he was with Zega Financial in Ellicott City Maryland. Mr. Petrie has a

B.S in Business Administration from Emmanuel College in Boston Massachusetts

Since January 2016, Mr. Petrie has been registered through the Financial Industry Regulatory Authority (FINRA) with Compass Securities Corporation as a General Securities Representative (Series 7), He is also registered as a securities agent of Compass Securities Corporation, with the Commonwealth of Massachusetts and has taken and passed the state securities agent examination (Series 63) and the state investment adviser representative examination (Series 65).

ITEM 3: Disciplinary Information

There are no legal or disciplinary matters that would-be material to the ability of a Client or prospective Client to evaluate Mr. Petrie. In particular, Mr. Petrie has not been subject to any of the types of matters described below in this Section.

A. Criminal or Civil Actions

Petrie has never been and is not currently involved in a criminal or civil action in a domestic, foreign or military court, in which Mr. Petrie was:

1. convicted of, pled guilty to, pled nolo contendere to or no contest to, any criminal action;
2. named in a criminal action that is currently pending; or
3. found in any action to have violated any investment-related statute or regulation; or
4. the subject of any order, judgment or decree permanently or temporarily enjoining, or otherwise limiting, Mr. Petrie from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. Administrative Proceedings

Mr. Petrie has never been and is not currently involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Petrie was:

found to have caused an investment-related business to lose its authorization to do business; or

1. found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority denying, suspending, or revoking the authorization of Mr. Petrie to act in an investment-related business;
2. barring or suspending Mr. Petrie from association with an investment-related business;
3. otherwise significantly limiting the investment-related activities of Mr. Petrie;
4. or imposing a civil money penalty of more than \$2,500 on Mr. Petrie

C. Action by Self-Regulatory Organizations

Mr. Petrie has not been involved in any proceeding before any self-regulatory organization, such as the Financial Industry Regulatory Authority, in which he was:

1. found to have caused an investment-related business to lose its authorization to do business; or
2. found to have been involved in a violation of the organization's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; or (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

E. Other Proceedings

Mr. Petrie has not been involved in any other proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct. Nor has Mr. Dolan ever resigned or otherwise relinquished his attainment, designation, or license in anticipation of such a proceeding.

E. Arbitrations

Mr. Petrie has not been involved in an arbitration that resulted in an award against him in excess of \$2,500 or that found him liable in an arbitration claim that alleged damages in excess of \$2,500 involving any of the following:

1. an investment or an investment-related business or activity;
2. fraud, false statement(s), or omissions;
3. theft, embezzlement, or other wrongful taking of property;
4. bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

F. Civil, Self-Regulatory or Administrative Actions

Mr. Petrie has not been involved in an action that resulted in an award or otherwise found him liable involving any of the following:

- a. an investment or an investment-related business or activity;
- b. fraud, false statement(s), or omissions;
- c. theft, embezzlement, or other wrongful taking of property;
- d. bribery, forgery, counterfeiting, or extortion; or
- e. dishonest, unfair, or unethical practices.

ITEM 4: Other Business Activities

A. Investment Related Activities

Mr. Petrie is registered as a securities representative of Compass Securities Corporation (Compass), a broker-dealer based in Braintree Massachusetts. Mr. Petrie provides services through Compass that are similar to those he provides through the Firm, but where his activities involve representing an asset manager that offers its services through mutual funds, hedge funds or otherwise may involve sales of securities. Mr. Petrie's activities through the Firm and Compass are his main investment related business activities or occupation. Other activities are listed below.

B. Other Activities for Compensation

In addition to the business activities he provides through the Firm and Compass, Mr. Petrie is also a fifty per cent owner in TAP Distributors which is an investment related non-registered entity and he is an Independent Contractor for Desalvo Consulting, LLC which is a non-investment related management consulting and coaching company.

ITEM 5: Additional Compensation

No person that is not a Client provides any economic benefit to Mr. Petrie for providing advisory services to Clients.

ITEM 6: Supervision

All employees of the Firm are supervised by Mr. Dolan. The Firm has adopted policies and procedures reasonably intended to assure that Mr. Petrie and the Firm comply with all applicable statutory and regulatory requirements governing the business of the Firm.

ITEM 7: Requirements for State-Registered Advisers

A. Additional Disciplinary Information

All disciplinary information is described in Item 3, above.

B. Bankruptcy

Mr. Petrie has never been the subject of a bankruptcy petition.