

XY INVESTMENT SOLUTIONS, LLC

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of XY Investment Solutions, LLC (hereinafter “XY Investment Solutions” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, XY Investment Solutions is required to discuss any material changes that have been made to the brochure since the last annual amendment. XY Investment Solutions originally applied for registration as an investment adviser directly with the SEC pursuant to rule 203A-2(c), as it had a reasonable expectation of becoming eligible for SEC registration within 120 days of its registration becoming effective. Because it no longer has such reasonable expectation of becoming eligible for SEC registration by the 120 day deadline, XY Investment Solutions has applied for registration directly with the State of Montana in conjunction with the filing of this Disclosure Brochure.

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Item 4. Advisory Business

XY Investment Solutions builds investment models through a technology solution. The models can be utilized by registered investment advisers that are part of the XY Planning Network (“RIAs”), but not affiliated with XY Investment Solutions. Prior to XY Investment Solutions rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with XY Investment Solutions and/or the RIAs setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

XY Investment Solutions originally filed for registration as an investment adviser directly with the SEC in June 2017 pursuant to rule 203A-2(c), as it had a reasonable expectation of becoming eligible for SEC registration within 120 days of its registration becoming effective. Because it no longer has such reasonable expectation of becoming eligible for SEC registration by the 120 day deadline, XY Investment Solutions has applied for registration directly with the State of Montana in conjunction with the filing of this Disclosure Brochure.

XY Investment Solutions is owned by XY Planning Network, LLC. As of the date of this filing, XY Investment Solutions does not have any assets under management.

While this brochure generally describes the business of XY Investment Solutions, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on XY Investment Solutions’ behalf and is subject to the Firm’s supervision or control. The use of “clients” throughout the brochure refers to the RIAs and not the clients of those RIAs. The RIAs’ clients will, however, receive a copy of XY Investment Solutions’ Disclosure Brochure.

Investment Management Services

XY Investment Solutions manages client investments in model portfolios on a discretionary basis. XY Investment Solutions primarily allocates client assets among various mutual funds and exchange-traded funds (“ETFs”). XY Investment Solutions may also allocate client assets in individual debt and equity securities, options and independent investment managers (“Independent Managers”). While the Firm will provide guidance and information about the model portfolios, RIAs are responsible for choosing the models and allocation for their clients.

XY Investment Solutions does not tailor its advisory services to meet the needs of its individual clients. As mentioned above, the investments are managed through models. RIAs and their client (through their RIAs) can, however, impose reasonable restrictions on investing in certain securities and types of securities if XY Investment Solutions determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm’s management efforts.. RIAs are advised to promptly notify XY Investment Solutions if they wish to place any limitations on the management of their clients’ assets.

Item 5. Fees and Compensation

XY Investment Solutions offers investment management services for an annual fee based on the amount of client assets under the Firm's management. This management fee varies between 25 and 35 basis points (0.25% – 0.35%) in accordance with the following fee schedule:

<u>PORTFOLIO VALUE</u>	<u>BASE FEE</u>
First \$5,000,000	0.35%
Next \$20,000,000	0.30%
Above \$25,000,000	0.25%

The annual fee is prorated and charged quarterly, in advance, based upon the market value of the account on the last day of the previous billing period. If assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is not adjusted to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Fee Discretion

XY Investment Solutions may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

Additional Fees and Expenses

In addition to the advisory fees paid to XY Investment Solutions, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (*e.g.*, fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12, below.

Direct Fee Debit

Clients provide XY Investment Solutions with the authority to directly debit their accounts for payment of the investment advisory fees (“Direct Debit”). The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to XY Investment Solutions. If a client or custodian cannot provide XY Investment Solutions with the authority to Direct Debit, the client shall pay the fee based upon XY Investment Solutions’ calculations as described above. Payment for the services to XY Investment Solutions is due within 10 days after the end of the quarter regardless of whether the client has received fees from its investing clients.

Account Additions and Withdrawals

Clients can make additions to and withdrawals from their account at any time, subject to XY Investment Solutions’ right to terminate an account. Additions can be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client’s account. Clients can withdraw account assets on notice to XY Investment Solutions, subject to the usual and customary securities settlement procedures. However, the Firm designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client’s investment objectives. XY Investment Solutions may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

Item 6. Performance-Based Fees and Side-by-Side Management

XY Investment Solutions does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client’s assets).

Item 7. Types of Clients

XY Investment Solutions offers services to RIAs. Those RIAs will utilize the Firm’s models for their clients which will include individuals as well as high net worth individuals, trusts, estates, charitable organizations, corporations and business entities.

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

Methods of Analysis and Investment Strategy

XY Investment Solutions' services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. XY Investment Solutions' investment approach is firmly rooted in the belief that markets are "efficient" over long periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. XY Investment Solutions recommends diversified portfolios, principally through the use of passively managed, asset class mutual funds and ETFs.

Although all investments involve risk, XY Investment Solutions' investment advice seeks to limit risk through broad diversification among asset classes and. XY Investment Solutions' investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that XY Investment Solutions' strategy seeks to minimize.

In the implementation of investment plans, XY Investment Solutions therefore primarily uses mutual funds and may also utilize Exchange Traded Funds (ETFs) to represent a market sector.

Clients may hold or retain other types of assets as well, and XY Investment Solutions may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

XY Investment Solutions' strategies do not utilize securities that we believe would be classified as having any unusual risks, and we do not recommend frequent trading, which can increase brokerage and other costs and taxes.

XY Investment Solutions receives supporting research from East Bay Financial Services and from other consultants, including economists affiliated with Dimensional Fund Advisors ("DFA"). XY Investment Solutions utilizes DFA mutual funds in client portfolios. DFA mutual funds follow a passive asset class investment philosophy with low holdings turnover. DFA provides historical market analysis, risk/return analysis, and continuing education to XY Investment Solutions.

Analysis of a Client's Financial Situation

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, XY Investment Solutions relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. To derive a recommended asset allocation, XY Investment Solutions may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks

associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those used in the analysis
- The risk that future rates of return will fall short of the estimates used in the simulation
- The risk that inflation will exceed the estimates used in the simulation
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by XY Investment Solutions may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include those of any size market capitalization. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in XY Investment Solutions' investment strategies funds are the U.S. and International small capitalization and small capitalization value funds and emerging markets funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities, or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by XY Investment Solutions may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

Item 9. Disciplinary Information

XY Investment Solutions has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations.

Affiliation with Other Investment Advisers

Certain of XY Investment Solutions' Supervised Persons, in their individual capacities, are also investment adviser representatives or consultants with other advisory firms. Specifically, Michael Kitces is the Director of Research, investment adviser representative, and approximate 2% owner of Pinnacle Advisory Group, Inc. A conflict of interest exists to the extent that XY Investment Solutions or its Supervised Persons recommends those firms to clients or where those firms recommend their clients use the Program. In order to mitigate these conflicts, XY Investment Solutions does not allow such cross referrals.

XY Planning Network

The Firm is under common control with the XY Planning Network. XY Planning Network is a community-driven advisor support network of more than four hundred financial advisors that provides tools, resources, and services, to enable state-registered RIAs to start, run, and grow their own fee-only financial planning practices serving Gen X and Gen Y clients for a monthly subscription fee. XYPN connects consumers with our diverse community of fee-only CFPs dedicated to bringing real financial planning to the next generation without regards to investment account minimums.

Item 11. Code of Ethics

XY Investment Solutions has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. XY Investment Solutions' Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of XY Investment Solutions' personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact XY Investment Solutions to request a copy of its Code of Ethics.

Item 12. Brokerage Practices

Recommendation of Broker-Dealers for Client Transactions

XY Investment Solutions recommends that clients utilize the custody, brokerage and clearing services of TD Ameritrade Institutional ("TD Ameritrade"), a division of TD Ameritrade, Inc., member FINRA/SIPC, an unaffiliated SEC-registered broker-dealer and FINRA member, for investment management accounts. XY Investment Solutions participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. XY Investment Solutions receives some benefits from TD Ameritrade through its participation in the program. The final decision to custody

assets with TD Ameritrade is at the discretion of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. XY Investment Solutions is independently owned and operated and not affiliated with TD Ameritrade. TD Ameritrade provides XY Investment Solutions with access to its institutional trading and custody services, which are typically not available to retail investors.

Factors which XY Investment Solutions considers in recommending TD Ameritrade or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. TD Ameritrade enables the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by TD Ameritrade may be higher or lower than those charged by other Financial Institutions.

The commissions paid by XY Investment Solutions' clients to TD Ameritrade comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where XY Investment Solutions determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. XY Investment Solutions seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions are directed to certain broker-dealers in return for investment research products and/or services which assist XY Investment Solutions in its investment decision-making process. Such research will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because XY Investment Solutions does not have to produce or pay for the products or services.

XY Investment Solutions periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Software and Support Provided by Financial Institutions

XY Investment Solutions receives without cost from TD Ameritrade administrative support, computer software, related systems support, as well as other third party support as further described below (together "Support") which allow XY Investment Solutions to better monitor client accounts maintained at TD Ameritrade and otherwise conduct its business. XY Investment Solutions receives the Support without cost because the Firm renders investment management services to clients that maintain assets at TD Ameritrade. The Support is not provided in connection with securities transactions of clients (i.e., not "soft dollars").

The Support benefits XY Investment Solutions, but not its clients directly. Clients should be aware that XY Investment Solutions' receipt of economic benefits such as the Support from a broker-dealer creates a conflict of interest since these benefits may influence the Firm's choice of broker-dealer over another that does not furnish similar software, systems support or services. In fulfilling its duties to its clients, XY Investment Solutions endeavors at all times to put the interests of its clients first and has determined that the recommendation of TD Ameritrade is in the best interest of clients and satisfies the Firm's duty to seek best execution.

Specifically, XY Investment Solutions receives the following benefits from TD Ameritrade: i) receipt of duplicate client confirmations and bundled duplicate statements; ii) access to a trading desk that exclusively services its institutional traders; iii) access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and iv) access to an electronic communication network for client order entry and account information.

In addition, TD Ameritrade provides access to its investment adviser platform to XY Planning Network member advisers regardless of the assets managed or place on the TD Ameritrade platform by such adviser. Furthermore, TD Ameritrade is a co-national sponsor of the XY Planning Network. TD Ameritrade pays a flat fee for the year, and in return receives marketing to XY Planning Network members. The TD Ameritrade logo is included in the XY Planning Network's newsletter, TD Ameritrade gives quarterly sales webinars to members, and other opportunities to market to those members. TD Ameritrade also sponsors the XY Planning Network National Conference by purchasing a booth and other sponsorship fees. These relationships result in a conflict of interest for XY Investment Solutions to recommend TD Ameritrade for the Program.

There is no direct link between XY Investment Solutions' participation in TD Ameritrade's institutional customer program and the investment advice it gives to its clients, although XY Investment Solutions receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. Additionally, XY Investment Solutions may receive the following benefits from TD Ameritrade through its registered investment adviser division: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information. The Firm also has the ability deduct advisory fees 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 the Firm by third party vendors. TD Ameritrade funds business consulting and professional services received by XY Investment Solutions' related persons.

Some of the products and services made available by TD Ameritrade through the program may benefit XY Investment Solutions but not its client. These products or services may assist XY Investment Solutions in

managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help XY Investment Solutions manage and further develop its business enterprise. The benefits received by XY Investment Solutions' participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

Brokerage for Client Referrals

XY Investment Solutions does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

Directed Brokerage

The client may direct XY Investment Solutions in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by XY Investment Solutions (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, XY Investment Solutions may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Trade Aggregation

Transactions for each client will be effected independently, unless XY Investment Solutions decides to purchase or sell the same securities for several clients at approximately the same time. XY Investment Solutions may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among XY Investment Solutions' clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which XY Investment Solutions' Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. XY Investment Solutions does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13. Review of Accounts

Account Reviews

XY Investment Solutions monitors the model portfolios on a continuous and ongoing basis. Such reviews are conducted by the Firm's Principals, as well as East Bay Financial Services, LLC - an independent and unaffiliated third-party retained to lead the Firm's investment committee in areas such as model creation, portfolio management, and investment research.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from XY Investment Solutions and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from XY Investment Solutions or an outside service provider.

Item 14. Client Referrals and Other Compensation

Client Referrals

The Firm does not currently provide compensation to any third-party solicitors for client referrals, and does not receive compensation from any third-party for client referrals.

Item 15. Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution authorize XY Investment Solutions to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to XY Investment Solutions.

In addition, as discussed in Item 13, XY Investment Solutions will also send, or otherwise make available, periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from XY Investment Solutions.

Item 16. Investment Discretion

XY Investment Solutions is given the authority to exercise discretion on behalf of clients. XY Investment Solutions is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. XY Investment Solutions is given this authority through a power-of-attorney included in the agreement between XY Investment Solutions and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). XY Investment Solutions takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

Item 17. Voting Client Securities

XY Investment Solutions does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

Item 18. Financial Information

XY Investment Solutions is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19. Requirements for State-Registered Advisers

- A. Please refer to the ADV Part 2B Brochure Supplement for the formal education and business background of the Firm's principal executive officers and management persons.
- B. The Firm is not actively engaged in any business other than giving investment advice.
- C. Neither the Firm nor any of its supervised persons are compensated for advisory services with performance based fees.
- D. Neither the Firm nor any of its management persons have been involved in any of the events required to be disclosed in this Item 19(D), including any award or liability as part of arbitration, civil proceeding, self-regulatory organization proceeding, or administrative proceeding.
- E. Neither the Firm nor any of its management persons have any relationship or arrangement with any issuer of securities.