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## **AdviseMe National Advisors, Registered Investment Advisor**

**28601 Chagrin Blvd #550, Cleveland, OH 44122  
Phone: 216-595-0800  
Fax: 216-595-0825**

**PensionExpert@PA401k.com**

**[WWW.PA401K.COM](http://WWW.PA401K.COM)**

**March 30, 2020**

**IARD/CRD No: 141129**

**FORM ADV PART 2A  
BROCHURE**

**This brochure provides information about the qualifications and business practices of AdviseMe National Advisors, a registered investment advisor. If you have any questions about the contents of this brochure, please contact us at 216-595-0800. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about AdviseMe National Advisors is also available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov). The IARD/CRD number for AdviseMe National Advisors is 141129.**

**Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## **Material Changes Part 2A**

The purpose of this section is to disclose material changes that have been made to this Brochure since the last annual update of this Brochure. The last annual update of this Brochure was dated March 22, 2019. There have been no material changes made to this Brochure since its last annual update.

## Table of Contents Part 2A

Cover Page	Page 1
Material Changes Part 2A	Page 2
Table of Contents Part 2A	Page 3
Advisory Services	Page 4
Fees and Compensation	Page 5
Performance-Based Fees and Side-By-Side Management	Page 7
Type of Clients	Page 7
Methods of Analysis, Investment Strategies and Risk of Loss	Page 7
Disciplinary Information	Page 8
Other Financial Industry Activities and Affiliations	Page 9
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 9
Brokerage Practices	Page 10
Review of Accounts	Page 11
Client Referrals and Other Compensation	Page 13
Custody	Page 13
Investment Discretion	Page 13
Voting Client Securities	Page 13
Financial Information	Page 13
Additional Information	Page 14

## Advisory Services

### Services Offered

AdviseMe National Advisors, Registered Investment Advisor ("AdviseMe NA"), owned by firm President, David Krasnow, offers a variety of services to meet the needs of its clients. Compensation also takes a variety of forms and is described as follows:

- **Pension Consulting:** AdviseMe NA works with its clients in every aspect of the retirement plan process for their company sponsored retirement plans including existing investment plan review, existing document review, enrollment and education, on-going plan maintenance and support.
- **Individual Consulting:** AdviseMe NA provides investment advice to individuals on an unsolicited basis on their personal investments. These clients are usually related in some way to AdviseMe NA's retirement plan clients (usually an employee of the plan sponsor).
- **AdviseMe!®Managed Accounts:** A fee-based managed account program offered to participants of our retirement plan clients who officially join the program by signing a Plan Sponsor agreement. It offers the participant the right to retain AdviseMe NA as their Individual Investment Advisor for their own individual 401(k) account. After working with each participant to determine their proper investment suitability, AdviseMe NA assumes control of their individual account in regards to the choosing of the investments by building, with the assistance of Tred Avon Family Wealth, LLC, and placing their accounts into the proper asset allocation models that vary by risk. An investment advisory agreement is executed between the participant and AdviseMe NA.
- **myAdviseMe!®Managed Accounts:** A fee based managed account program offered to clients of AdviseMe National Advisors of Puerto Rico, for their individual investments, IRAs, rollover IRAs, trusts or qualified plans (pooled). Yahaira Torres-Siaca of AdviseMe NA acts as the Individual Investment Advisor for their account. After working with the client, the proper investment suitability is determined and AdviseMe NA assumes control of their account. The MyAdviseMe Portfolios are designed by Tred Avon Family Wealth, LLC, an investment research firm retained by Pension Solutions, Inc. as outsourced Chief Investment Officer . An investment advisory agreement is executed between the participant and Munoz and Torres-Siaca. Ceros Financial Services, Inc. serves as the custodian for these assets.

All services described above are tailored to the individual needs of each client. AdviseMe NA will honor any reasonable restrictions on investing in certain securities or types of securities imposed by the client in writing.

AdviseMe NA will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will AdviseMe NA accept or maintain custody of a client's funds or securities.

- **Financial Planning Services:**

In addition to asset management services, AdviseMe NA may provide Financial Planning Services to some of its clients. AdviseMe NA's Financial Planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial Planning Services may also include recommendations relating to investment strategies as well as tailored investment advice.

AdviseMe NA may offer its services through the following business names: AdviseMe NA, Pension Advisors (locations in Cleveland, Milwaukee-Chicago, and Puerto Rico), and Pension Solutions, Inc.

## **Fees**

For the payment of asset management services, all fees paid to AdviseMe NA for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the sponsor also imposes sales charges, a client may pay an initial or deferred sales or surrender charge. A client could invest in these products directly, without the services of AdviseMe NA. In that case, the client would not receive the services provided by AdviseMe NA which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by AdviseMe NA to fully understand the total fees to be paid.

Custodians may charge accounts for various transactional costs, retirement plan, and administrative fees. In addition, some mutual fund assets deposited in the account may have been subject to 12(b)(1) fees and other mutual fund annual expenses as described in each fund's prospectus. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.

## **Wrap Fee Programs**

AdviseMe NA does not engage in wrap fee programs, directly.

## **Assets Under Management**

As of December 31, 2019, AdviseMe manages a total of \$135,852,750 on a discretionary basis and \$1,110,239,022 on a non-discretionary basis.

## **Fees and Compensation**

**Pension Consulting:** Clients are billed an advisory fee for services outlined in their Pension Advisory Agreement. These fees may be negotiated at the sole discretion of the advisor and range from 0.25% to 1.5%. Invoices are prepared quarterly in arrears. The fee is computed using the fair market value of the total assets in the plan on the last day of the calendar quarter times the negotiated rate. Fees are prorated for accounts opened during the quarter. Fees are non-negotiable and are due within 30 days. Checks are made payable to AdviseMe National Advisors.

**Individual Consulting:** Clients are billed in one of two ways. They are either billed an asset management fee, payable in arrears, or are billed a one-time consulting fee based on a one-time fixed fee for services outlined in their Pension Advisory Agreement. If the fee is an asset management fee, it is computed using the fair market value of the total assets in the account on the last day of the calendar quarter times the negotiated rate. These fees may be negotiated at the sole discretion of the advisor and range from 0.25% to 1.5%. Invoices are prepared quarterly. Fees are prorated for accounts opened during the quarter. Invoices for fixed-fee or hourly arrangements are billed upon completion of the services. Fees are non-negotiable and are due upon receipt.

**AdviseMe!®Managed Accounts:** Pursuant to an investment advisory agreement signed by each client, the client will pay a quarterly asset management fee, payable in arrears, as outlined in the agreement based on the amount of assets managed as of the end of the last day of each calendar quarter. The agreement authorizes that their account be directly debited for this fee. The custodial broker dealer is responsible for computing the fee on our behalf. In some instances, the Plan Sponsor has assumed the responsibility of paying this fee for their participants and as such, the investment advisory agreement states that the plan sponsor is assuming all costs. The Plan Sponsor is then invoiced directly on a quarterly basis in arrears. The fee is computed using the fair market value of the total assets in the plan on the last day of the calendar quarter times the negotiated annual rate, which ranges from 0.25% to 0.75%. Each quarterly billing is 25% of the calculated annual fee. Fees are non-negotiable and are due upon receipt. Checks are made payable to AdviseMe National Advisors or wired directly from the custodial broker dealer to AdviseMe National Advisors.

**myAdviseMe!®Managed Accounts:** Pursuant to an investment advisory agreement signed by each client, the client will pay a quarterly asset management fee, payable in arrears, at the annual rate of .0075% times the amount of assets managed as of the end of the last day of each calendar quarter. Each quarterly billing is 25% of the calculated annual fee. AdviseMe NA calculates the quarterly fee and Ceros Financial Services, Inc. (the custodian) debits this fee from their accounts on our behalf.

**Additional Fee Disclosures:** Our fees are separate from, and in addition to, the fees and expenses of mutual funds or other investments we recommend to you. The fees of such investments are set forth in the prospectus or similar disclosure document, as applicable.

All of our investment adviser representatives are also registered representatives of Independent Financial Group, LLC, an unaffiliated broker-dealer. While these individuals are entitled to receive asset-based sales charges or service fees from the sale of mutual funds in their capacity as registered representatives, no representative receives this compensation in connection with services provided to clients of AdviseMe National Advisors. The only form of compensation the firm and its representatives receive, directly or indirectly, from advisory clients are advisory fees.

**Termination of Agreement:** Clients may request to terminate their advisory contract with AdviseMe NA, in whole or in part, by providing advance written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

## Performance-Based Fees and Side-By-Side Management

AdviseMe NA's investment advice does not extend to the management of private funds. The firm's offerings are limited to portfolio management and financial planning services on behalf of individual clients. Where advisers manage private funds in addition to other services, the potential for a conflict of interest is magnified, particularly where the firm may have an incentive to favor those accounts charged a performance fee. As AdviseMe's advisory services do not incorporate performance fees or the offering of any additional investment services, side-by-side management does not apply to those services rendered by the firm.

## Type of Clients

AdviseMe NA provides investment advisory services to individuals, corporations and other business entities. AdviseMe NA does not have a minimum account size however certain third-party asset managers require a minimum investment to open an account. The specific amounts are detailed in the third party providers' agreements. Accounts below the stated minimums may be accepted on an individual basis at the discretion of AdviseMe NA and the platform sponsor.

## Methods of Analysis, Investment Strategies and Risk of Loss

AdviseMe NA utilizes methods of analysis and investment strategies, including charting, fundamental, cyclical and technical, in formulating investment advice or managing assets.

- *Fundamental:* Fundamental analysis is a general assessment based upon various factors including sale price, asset value, market structure, and history. AdviseMe NA will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.
- *Cyclical:* Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. The primary risk of using cyclical analysis is that past performance cannot guarantee to future results.
- *Charting and Technical:* Charting consists of preparing a technical analysis using diagrams to illustrate various patterns or progressions in market or account movement. Similar to charting, technical analysis employs the use of statistical models and quantitative methodologies to evaluate performance and value over a specified period of time. Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients, and may involve the use of charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that the firm will be able to accurately predict such a re-occurrence.

The main sources of information utilized are financial newspapers and magazines, research materials prepared by others, corporate rating services and annual reports, prospectuses and lastly filings with the Securities and Exchange Commission. Clients must be aware that investing in securities involves risk of loss that clients should be prepared to bear.

AdviseMe NA recommends general securities in client portfolios that include but are not limited to individual stocks, mutual funds, government securities and Real Estate Investment Trusts (REITS).

## **Disciplinary Information**

- A. Neither AdviseMe NA nor an AdviseMe NA manager have been or are currently involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which AdviseMe NA or the AdviseMe NA manager:
1. has been convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. has been the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  3. has been found to have been involved in a violation of an investment-related statute or regulation; or
  4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.
- B. Neither AdviseMe NA nor an AdviseMe NA manager have been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which AdviseMe NA or an AdviseMe NA manager:
1. was found to have caused an investment-related business to lose its authorization to do business; or
  2. was 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
    - i. denying, suspending, or revoking the authorization of AdviseMe or a AdviseMe manager to act in an investment-related business;
    - ii. barring or suspending AdviseMe NA or an AdviseMe NA manager's association with an investment-related business;
    - iii. otherwise significantly limiting AdviseMe NA or an AdviseMe NA manager's investment-related activities; or
    - iv. imposing a civil money penalty of more than \$2,500 on AdviseMe NA or an AdviseMe NA manager.
- C. A self-regulatory organization (SRO) proceeding in which AdviseMe NA or an AdviseMe NA manager:



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

## **Other Financial Industry Activities and Affiliations**

- A. Advisory Representatives are also securities Registered Representatives with Independent Financial Group, LLC. As such, they are able to sell securities products to investment advisory clients for compensation.
- B. AdviseMe NA Representatives are not registered as a futures commission merchant, commodity pool operator, a commodity-trading advisor, or an associated person of the foregoing entities.
- C. Neither AdviseMe NA nor any of its management persons have other relationships or arrangements to report that are material to its advisory business or to its clients.

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

AdviseMe NA has adopted a Code of Ethics (the "Code") that sets forth the basic policies of ethical conduct for all its employees of the adviser including its registered and non-registered assistants ("Covered Persons"). The Code requires that all Covered Persons conduct all business dealings in an ethical fashion, and encourages all Covered Persons to meet not only the technical requirements of the Code but also its spirit. Under the Code, Covered Persons have an affirmative duty of care, loyalty and honesty and must act in the best interest of their clients.

The Code requires Covered Persons to comply with all federal securities laws. In addition, Covered Persons are prohibited from defrauding, misleading or manipulating a client in any way in connection with the purchase or sale of a security. Further, Covered Persons may not favor the interests of one client over the other.

In the course of normal business, Covered Persons may receive confidential information concerning clients and potential clients. The general rule, as discussed in the Code, is that this information should never be communicated to anyone other than Advisory Representatives, assistants and employees who need to know, and where appropriate, to the participants involved in a specific transaction.

The Code has strict guidelines regarding personal securities transactions, designed to ensure that Covered Persons are not misusing their inside positions at clients' expense. Covered Persons are specifically prohibited from profiting personally, directly or indirectly, as a result of knowledge about a security or transactions. The Code governs personal trading by each employee of AdviseMe NA deemed to be a Covered Person and is intended to ensure that securities transactions effected by Covered Persons of AdviseMe NA are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

AdviseMe NA and/or its advisory representatives may from time to time purchase or sell products that they may recommend to clients. Advisory representatives for AdviseMe NA are also Registered Representatives with Independent Financial Group, LLC, a FINRA registered broker/dealer.

To enable AdviseMe NA to monitor compliance with the Code, we require that Covered Persons provide us with duplicate copies of confirmations or statements for accounts that they hold at other financial institutions. We collect and maintain records of securities holdings and securities transactions affected by Covered Persons. These records are reviewed to identify and resolve potential conflicts of interest.

AdviseMe NA's Code of Ethics is available upon request.

## Brokerage Practices

Clients may specify which broker-dealer to use or the Advisory Representative may make recommendations. Generally, these recommendations are based on the Advisory Representative's perception of the breadth of services offered and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from other broker-dealers for similar services.

1. Research and Other Soft Dollar Benefits. AdviseMe NA does not engage in soft dollar benefits. AdviseMe NA does not use client brokerage commissions (or markups or markdowns) to obtain research or other products or services.
2. Directed Brokerage. AdviseMe NA does not routinely recommend, request or require that a client direct AdviseMe NA to execute transactions through a specified broker-dealer.

**Best Execution:** As an investment advisory firm, AdviseMe NA has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. AdviseMe NA's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. AdviseMe NA will execute its transactions through an unaffiliated broker-dealer. The broker-dealer will be chosen based on the following: 1) the broker's capital depth, 2) the broker's market access, 3) the broker's transaction confirmation and account statement practices, 4) our knowledge of negotiated commission rates and spreads currently made available, 5) the nature and character of the markets for the security to be purchased or sold, 6) the desired timing of the transaction, 7) the execution, 8) clearance and settlement capabilities of the broker selected and others considered, 9) our knowledge of any actual or apparent operational problems of a broker and 10) the reasonableness of the commission or its equivalent for the specific transaction. Based on the above criteria, AdviseMe NA may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker. This would justify higher commissions (or their equivalent) than other transactions requiring routine services. If AdviseMe NA is directed by the client to direct trades to a specific broker dealer other than the custodian typically used by AdviseMe NA for trade execution, it is disclosed that AdviseMe NA's ability to negotiate commissions (where applicable), obtain volume discounts, or otherwise obtain best execution may not be as favorable as might otherwise be obtained.

**Order Aggregation:** AdviseMe NA may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. For the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is

consistent with the duty to seek best execution and is consistent with the terms of AdviseMe NA's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. AdviseMe NA may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

## **Review of Accounts**

**Pension Consulting:** Quarterly plan reviews are conducted by the investment adviser representatives of the firm, who work with representatives from the company sponsored retirement plan to discuss investment performance, specific plan trends and new legislative updates. A Fund Performance schedule is prepared quarterly as a platform for review. The review consists of using a combination of historical fund returns, ratio analysis and Morningstar ratings. This systematic approach allows for informed decisions on the investment options made available to the Plan as well as the ability to identify any under-performing funds. A comprehensive fund analysis of the investment alternatives is also prepared quarterly based on style orientation, peer benchmark returns and regression statistics.

Pension Solutions, Inc. dba Pension Advisors, has entered into a consulting agreement with Tred Avon Family Wealth, LLC to provide consulting services to the Pension Consulting Business. Consulting services include, but are not limited to, the review of the total fund lineup available to clients of Pension Advisors. Tred Avon Family Wealth, LLC provides investment recommendations to Pension Advisors of the top three funds per financial category and/or sector on a periodic basis based on its investment analysis technology. Either party may terminate this agreement by giving at least 60 days' notice to the other party of its intent to terminate.

The Plan is also reviewed in its entirety making sure that the fees remain competitive, that the Plan is adhering to the Investment Policy Statement that the plan document is current with all legislative updates and that enrollment is satisfactory.

**Individual Consulting:** All individual accounts are monitored on an ongoing basis. The accounts are reviewed for their holdings, their account balances and their performance history. An Account Summary schedule is prepared quarterly as a platform for review. The review consists of using a combination of historical fund returns, ratio analysis and Morningstar ratings. This systematic approach allows for informed decisions on the investment options made available to the individual as well as the ability to identify any under-performing funds.

The President, David Krasnow, performs the quarterly reviews of all individual accounts. If there is a need for further review, it will be performed by Debi Stranman and/or Brandon Dunn.

The client will receive written statements, no less than quarterly, directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information. We also meet with the individual clients periodically to personally review the account positions as well as any change in status they may have.

**AdviseMe!® Managed Accounts:** Accounts are monitored by Tred Avon Family Wealth, LLC on an ongoing basis for consistency with the investment strategy of the model portfolio and for the performance of the individual mutual funds within the model. Triggering factors that would effect a change in the asset allocation model are a client's own investment objectives, a change in overall market conditions or under or out-performance by a particular fund. Asset Allocation Accounts are re-balanced on a regular basis and re-optimized when deemed necessary by the Advisor for those participating in the Model Portfolio/Asset Management Program. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.

Our affiliated pension consulting firm, Pension Solutions dba Pension Advisors, has entered into a consulting agreement with Tred Avon Family Wealth, LLC to provide consulting services to the AdviseMe! Managed Account program. Consulting services include, but are not limited to, the recommendation and ongoing monitoring of the asset allocation models. Tred Avon Family Wealth, LLC provides the asset allocation breakdowns for all of the AdviseMe! portfolios. Either party may terminate this agreement by giving at least 60 days' notice to the other party of its intent to terminate.

The client will receive written statements no less than quarterly directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information.

In addition, the client will receive other supporting reports from AdviseMe NA such as return information, reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts. Clients are encouraged to compare the statements provided by AdviseMe to the statements clients receive directly from the account custodian and immediately report any unexplained differences to AdviseMe and/or the custodian, as appropriate.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

**myAdviseMe!® Managed Accounts:** Tred Avon Family Wealth, LLC monitors accounts on an ongoing basis. They continuously evaluate the global macro-economic landscape and sift through technical market data in order to evaluate the top line allocation of the portfolios. They also monitor the performance of the mutual funds being held within these allocations to ensure they are performing as expected. The goal of the monitoring process is to deliver the best risk-adjusted opportunity for the participants. They make sure that the portfolios continue to be on track to achieve investors' goals, produce acceptable returns in relation to risk, and feature an acceptable level of risk.

**myAdviseMe!® Managed Accounts** are required to establish an account with Ceros Financial Services, Inc. who acts as custodian. They maintain custody of the client's asset and provide recordkeeping services. They also create and distribute the quarterly account statements directly to the client. These statements list the account positions, activity in the account over the covered period, and other related information.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

## **Client Referrals and Other Compensation**

- A. AdviseMe NA does not engage in activity with non-clients to gain economic benefits including sales awards or other prizes.
- B. AdviseMe NA may compensate other parties ("solicitors") for client referrals in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940 ("the Act"). When the solicitor is not a related party of AdviseMe NA, the terms of such compensation will be disclosed to the client at the time of the referral, and the solicitor will be required to deliver to referral clients, at the time of referral, a copy of this brochure as well as a Solicitors Disclosure Statement, which describes, among other things, the relationship between AdviseMe NA and the solicitor and the terms of compensation.

## **Custody**

AdviseMe NA is deemed to have custody of client assets solely because it deducts advisory fees from client accounts. Other than these client-authorized fee deductions, AdviseMe does not maintain or accept custody of client funds or securities.

## **Investment Discretion**

For Schwab Investment Accounts, AdviseMe! Managed Accounts and myAdviseMe! Managed Accounts, AdviseMe NA has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by AdviseMe NA will be in accordance with each client's investment objectives and goals.

## **Voting Client Securities**

### **Proxy Voting**

AdviseMe NA will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, AdviseMe NA cannot give any advice or take any action with respect to the voting of these proxies and will not provide proxy voting services to its clients.

For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, AdviseMe NA cannot give any advice or take action with respect to the voting of these proxies.

## **Financial Information**

AdviseMe NA does not require or solicit prepayment of \$1,200 in fees per client, six months or more in advance and therefore is not required to file financial information with the Securities & Exchange Commission or state of Ohio where AdviseMe NA is domiciled.

## **Additional Information**

### **Privacy Policy**

AdviseMe NA and its representatives collect non-public information about its clients from applications and other forms, which they receive from their clients and from oral and e-mail communications. AdviseMe NA never discloses the non-public information collected about its clients to anyone except in furtherance of our business relationship, and then only to those persons necessary to effect the transactions and provide the services that the Client authorizes (non-affiliated third parties such as broker-dealers, custodians, investment managers, etc.) or as otherwise provided by law.

If the client does not want us to disclose non-public, personal information to non-affiliated third parties, they have the option to opt out of these disclosures by directing us not make those disclosures other than disclosures permitted by law.

We restrict access to non-public information about our clients to those representatives and employees who need to know that information in order for them to provide them with our products and services. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard our client's non-public information.

Our written Privacy Policy will be provided to the Client at the time of the account opening. Annually, thereafter, a combined disclosure statement that includes the Privacy Policy, Business Continuity Plan, Code of Ethics and Brochure rule will be provided.

### **Business Continuity Plan**

AdviseMe NA has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur.

Contacting Us - If, after a significant business disruption, we cannot be contacted as usual, please call our alternative numbers or send an e-mail to the following addresses - David Krasnow (cell - (216) 337-6826, david@pa401k.com) or David Krasnow (cell - (216) 337-6826, david@pa401k.com) OR access the following web address - [www.pa401k.com](http://www.pa401k.com).

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

A copy of AdviseMe NA's Business Continuity Plan disclosure will be provided to the Client at the time of account opening and will be available at anytime upon request. Annually, thereafter, a combined disclosure statement that includes the Privacy Policy, Business Continuity Plan, Code of Ethics and Brochure rule will be provided.