

Item 1- Cover Page

Investment Advisor Brochure

(Form ADV Part 2A)



New England
Investment Consultants, Ltd.

New England Investment Consultants, Ltd.

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March 30, 2020

This brochure provides information about the qualifications and business practices of New England Investment Consultants, Ltd. If you have any questions about the contents of this brochure, please contact us at: 401-274-5000, or by email at: service@newenglandpension.com. 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.

New England Investment Consultants, Ltd. is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information with which you determine to hire or retain an Advisor.

Additional information about New England Investment Consultants, Ltd is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. The CRD number for New England Investment Consultants, Ltd. is 142531.

March 30, 2020

Item 2: Summary of Material Changes

Annual Update

In this item of Form ADV 2, New England Investment Consultants, Ltd, the firm, is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 29, 2019.

Material Changes since the Last Update

Our current Brochure does not contain any material changes; however, please note that we have updated the Assets Under Management information in accordance with the filing of our Annual Updating Amendment.

(Brochure Date: 03/30/2020)

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 401-274-5000 or by email at: service@newenglandpension.com.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 1: Cover Page

Item 2: Material Changes	2
Annual Update.....	2
Material Changes since the Last Update	2
Full Brochure Available	2
Item 3: Table of Contents	3
Item 4: Advisory Business	5
Firm Description	5
Firm Principal Owners.....	5
Types of Advisory Services	5
Client Tailored Services and Client Imposed Restrictions	7
Fiduciary Statement.....	8
Wrap Fee Programs	8
Client Assets under Management	8
Item 5: Fees and Compensation	8
Method of Compensation and Fee Schedule	8
Compensation Retirement Plan & Participant Services.....	10
Client Payment of Fees	10
Additional Client Fees Charged	10
Prepayment of Client Fees	11
External Compensation for the Sale of Securities to Clients	11
Other Compensation.....	11
Item 6: Performance-Based Fees	13
Sharing of Capital Gains	13
Item 7: Types of Clients	13
Description	13
Account Minimums	13
8: Methods of Analysis, Investment Strategies and Risk of Loss	13
Methods of Analysis and Investment Strategies	13
Investment Strategy and Method of Analysis Material Risks	14
Security Specific Material Risks	15
Item 9: Disciplinary Information	16
Criminal or Civil Actions	16
Administrative Enforcement Proceedings	16
Self Regulatory Organization Enforcement Proceedings	16
Item 10: Other Financial Industry Activities and Affiliations	16

Broker-Dealer or Representative Registration	16
Futures or Commodity Registration	16
Material Relationships Maintained by this Advisory Business and Conflicts of Interest.....	17
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest.....	18
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	18
Code of Ethics Description	18
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest	18
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest	18
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	19
Item 12: Brokerage Practices	19
Factors Used to Select Broker-Dealers for Client Transactions	19
Aggregating Securities Transactions for Client Accounts	20
Item 13: Review of Accounts	20
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved	20
Review of Client Accounts on Non-Periodic Basis	21
Content of Client Provided Reports and Frequency	21
Item 14: Client Referrals and Other Compensation	21
Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest	21
Advisory Firm Payments for Client Referrals	21
Item 15: Custody	21
Account Statements	22
Item 16: Investment Discretion	22
Discretionary and Non-discretionary Authority for Trading.....	20
Item 17: Voting Client Securities.....	23
Proxy Votes	23
Item 18: Financial Information	23
Balance Sheet	23
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients	24
Bankruptcy Petitions during the Past Ten Years	24
Item 19: Privacy Policy.....	24

Item 4: Advisory Business

Firm Description

New England Investment Consultants, Ltd hereafter referred to as “NEIC” provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate-planning.

Firm Principal Owners

Sergio A DeCurtis MBA, ARPS, AIF President, Owner & CCO of New England Investment Consultants, Ltd. (NEIC) an investment advisory firm founded in 2006.

Type of Advisory Services

NEIC is a fee based financial planning and investment management firm. NEIC will typically create a portfolio of no-load mutual funds, index funds, ETFs, or no-load annuities, and may use model portfolios if the models match the client’s investment asset allocation strategy. NEIC will allocate the client’s assets among various investments taking into consideration the overall management style selected by the client..

Investment advice is provided, with the client making the final decision on investment selection. NEIC does not act as a custodian of client assets. The client always maintains asset control.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

NEIC provides investment supervisory services, also known as asset management services and furnishes financial planning and investment advice through consultations.

On more than an occasional basis, NEIC furnishes advice to clients on matters not involving securities, such as taxation issues and trust services that often include estate planning.

ASSET MANAGEMENT

New England Investment Consultants, Ltd. principal service is providing investment advisory services based on the client's specific investment objectives, goals and financial situation. The advisor practices custom management of portfolios, on a non-discretionary basis, and has capability to provide discretionary management if requested according to the client's objectives. The advisor will look at mutual funds, stocks, foreign issuers, municipal, government and corporate debt securities, real estate and oil & gas interests, and CD's when tailoring a financial plan.

NEIC primarily recommends portfolios consisting of no-load mutual funds offered by Dimensional Fund Advisors (DFA) and Vanguard. DFA sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate NEIC on an hourly fee or negotiable fixed fee basis described in detail under "Fees and Compensation" section of this brochure.

The advisor may employ several different strategies, including: long-term purchases and short-term purchases. All of these strategies may be used at various times as a possible hedge against market movement which may adversely affect the client's portfolio.

The advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of the client or any risk deemed unacceptable for the client's risk tolerance.

Representatives of NEIC may also provide general non-securities advice on topics including estate planning, retirement planning, and mortgage consulting. Fees are billed at an hourly rate, negotiated in advance and paid as services are

rendered. This non-securities financial planning will not exceed 50% of the firm's billings.

ADVISORY SERVICES to RETIREMENT PLANS and PLAN PARTICIPANTS

New England Investment Consultants, Ltd. offers various levels of advisory and consulting services to employee benefit plans and to the participants of such plans (Participants). The services are designed to assist plan sponsors (Plan Sponsors) in meeting their management and fiduciary obligations to the Participants under the Employee Retirement Income Securities Act (ERISA) and the Pension Protection Act of 2006 (PPA). New England Investment Consultants, Ltd. will provide services to Plan Sponsors and their Participants as described below. Generally, investment advice provided to Plan Sponsors and Participants is regulated under ERISA and the PPA. Plan Sponsors must make the ultimate decision to retain New England Investment Consultants, Ltd. for pension consulting and other advisory services including, but not limited to, services at the participant level. The Plan Sponsor is free to seek independent advice about the appropriateness of any recommended services for the plan.

New England Investment Consultants, Ltd. develops an Investment Policy Statement for each plan, which may include some or all of the following areas: overview, investor circumstances, tax policy, reviews, diversification and investment constraints, selection/retention criteria for investments, investment monitoring and control procedures and duties and responsibilities.

Services include: Management of vendor relationships; Request for Proposals (RFPs); Assistance on plan design strategies; Fiduciary consulting and oversight; Investment Management; and Employee Education and Communication Services.

Advisory services provided to retirement plans may be solely provided by Investment Adviser Representatives (IARs), or in combination with third parties and their retirement plan services.

Client Tailored Services and Client Imposed Restrictions

New England Investment Consultants, Ltd. tailors investment advisory services to the individual needs of the client. New England Investment Consultants, Ltd. clients can impose restrictions on the investments in their account. New England Investment Consultants, Ltd. may accept any reasonable limitation or restriction to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to New England Investment Consultants, Ltd. in writing. The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective.

Fiduciary Statement

New England Investment Consultants, Ltd. and its employees are fiduciaries who must take into consideration the best interests of its clients. New England Investment Consultants, Ltd. will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. New England Investment Consultants, Ltd. will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, New England Investment Consultants, Ltd. has the obligation to deal fairly with clients. New England Investment Consultants, Ltd. has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
To have reasonable basis, information, and understanding of the facts to provide appropriate recommendations and representations;
Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Wrap Fee Programs

NEIC does not participate in wrap fee programs.

Client Assets under Management

As of December 31st, 2019, NEIC has \$730,680,977 client assets under management on a non-discretionary basis.

Item 5: Fees and Compensation**Method of Compensation and Fee Schedule**

NEIC bases its fees on a percentage of assets under management, hourly charges, and fixed fees.

ASSET MANAGEMENT

NEIC offers non-discretionary direct asset management services to advisory clients. The firm also has capability to provide discretionary management if requested. NEIC will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation,

portfolio monitoring and the overall investment program will be based on the above factors.

Fees for these services will be based on a percentage of Assets Under Management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
First \$1,000,000	0.90%	.225%
Next \$2,000,000	0.80%	.20%
Next \$3,000,000	0.70%	.175%
Next \$5,000,000	Negotiable	

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in arrears based on the amount of assets managed as of the opening of business on the last business day of each quarter. NEIC will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to NEIC or its designated service provider to withdraw fees from accounts. Clients will receive custodial statements showing the advisory fees debited from their account(s). Certain third party administrators will calculate and debit NEIC's fee and remit such fees to NEIC. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with 30 days written notice. NEIC will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees.

FINANCIAL PLANNING FEES

New England Investment Consultants, Ltd. intends to be compensated for its investment advisory services and/or financial planning services by charging fees on either an hourly or fixed/flat fee basis. Hourly fees will be assessed at a rate of \$250 per /hour, this fee will typically be charged for those clients requiring limited assistance with their financial planning needs. For clients requiring a comprehensive financial plan, a flat fee ranging from \$1,000 to \$3,000 will be charged based on the complexity of each client's circumstances. New England Investment Consultants, Ltd. fee will be negotiated in advance and will be set-out in each client's advisory contract. Final payment will be due upon completion of these services. Clients may request to terminate their advisory contract with New England Investment Consultants, Ltd., in whole or in part, by giving 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.

RETIREMENT PLAN and PARTICIPANT SERVICES FEES

Compensation - Retirement Plan and Participant Services

New England Investment Consultants, Ltd. charges an annualized fee of up to .25% of the plan's assets for the pension consulting services described above. In lieu of an asset-based fee, New England Investment Consultants, Ltd. may charge a fixed annual fee based on specific limited engagements. Generally, a fixed-fee will not exceed 1.00% of the plan's assets, unless there are special circumstances warranting a higher fee. The type and amount of the fees charged to the client are negotiable and are generally based on the size and complexity of the plan, the number of plan participants, the location of the participants, the estimated number of meetings required, and other factors that may be deemed relevant by New England Investment Consultants, Ltd. when negotiating with the client. An estimate of the total cost will be determined at the start of the advisory relationship.

Client Payment of Fees

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. Financial Planning fee will be negotiated in advance and will be set-out in each client's advisory contract. Final payment will be due in 90 days.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. NEIC's fees are exclusive of brokerage fees, transaction fees, and other related costs and expenses which shall be incurred by the client. For clients utilizing NEIC's services for asset management within a no load variable annuity, NEIC's fees are exclusive of any related expenses charged by the insurer including: mutual fund expenses, administrative, or mortality expense assessed by the no load annuity insurance provider. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees and taxes on brokerage accounts and securities transactions. All fees paid to NEIC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and exchange traded funds (ETF's) to their shareholders. These fees and expenses

are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds or ETF's directly, without the services of NEIC. In that case, the client would not receive the services provided by NEIC which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Dimensional Fund Advisors (DFA) funds also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds, the fees charged by the custodian, and the fees charged by NEIC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Such charges, fees and commissions are exclusive of and in addition to NEIC's fee and NEIC shall not receive any portion of these commissions, fees, and costs.

NEIC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Prepayment of Client Fees

Financial Planning fee will be negotiated in advance and will be set-out in each client's advisory contract. Final payment will be due in 90 days. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client.

External Compensation for the Sale of Securities to Clients

NEIC does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of NEIC.

Other Compensation

As disclosed in Item 10, certain of our management persons are Registered Representatives of a broker dealer, N.E. Private Client Advisors, Ltd. (NEPCA). As Registered Representatives, these individuals accept compensation for the sale of securities and other investment products.

This practice may present a conflict of interest and gives registered representatives an incentive to recommend investment products based on the compensation received rather than on a client's needs. To maintain objectivity NEIC Clients have the option to purchase investment products that the firm recommends through other custodians, brokerage or agents that are not affiliated with the firm. In cases where clients utilize the brokerage and custodial services provided by NEPCA, our affiliated broker dealer, the broker dealer may receive a service handling fee of \$3/ per trade as compensation for handling of a client trade. This \$3 handling fee is included in the current

schedule of custodial trade fees of \$14.95 assessed to the client. Commissions and other sales-related compensation are not New England Investment Consultants, Ltd.'s primary compensation.

Fees and Expenses (12b-1 fees)

Some client accounts may hold shares of investment companies, including money market funds, closed-end funds, and/or exchange-traded funds (Funds). Those funds have their own expenses, including certain advisory, distribution or other fees, and a client account invested in those funds will indirectly bear a portion of those expenses. Each of the fees discussed above is in addition to NEIC management fee. Funds may make payments to NEPCA the affiliated Broker Dealer Firm, pursuant to a Rule 12b-1 distribution plan or other arrangement as compensation for distribution, shareholder services, recordkeeping, or administrative services. These payments may be paid from the fund's total assets or may be paid by a fund's adviser or distributor. The broker/dealer custodian automatically credits client accounts with any 12b-1 fees received during the period the account is managed by the Firm. The Rule 12b-1 distribution plan and other fee arrangements will be disclosed upon request and typically are disclosed in the applicable fund's prospectus. NEIC uses its best efforts to purchase lower cost fund shares but in certain instances cannot because the fund company does not offer institutional class non 12b-1 fee paying funds or does not contractually offer them. A conflict of interest exists as NEIC advisors may be motivated to sell funds that generate higher fees, including 12b-1 fees. The client should review the fees charged by the Funds, the 12b-1 fees received by NEPCA and the fee charged by NEIC to understand the total fees incurred. Fees and Expenses (Mutual Funds Share Class Selection) Funds generally offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. For instance, in addition to retail share classes (typically referred to as class A, class B and class C shares), Funds may also offer institutional share classes or other share classes that are specifically designed for purchase by investors who meet certain specified eligibility criteria, including, for example, whether an account meets certain minimum dollar amount thresholds or is enrolled in an eligible fee-based investment advisory program with the custodian. Institutional share classes usually have a lower expense ratio than other share classes. NEIC advisors who are dually licensed, as Registered Representatives of NEPCA, may have a financial incentive to recommend or select share classes that have a 12b-1 fee because such share classes generally result in higher compensation. The Firm has taken steps to minimize this conflict of interest, including by providing guidance on this issue, as well as by conducting periodic reviews of client holdings in mutual fund investments to ensure the appropriateness of mutual fund share class selections and whether alternative mutual fund share class selections are available that might be more appropriate given the client's particularized investment objectives and any other appropriate considerations relevant to mutual fund share class selection. Regardless of such considerations, clients should not assume that they will be invested in the

share class with the lowest possible expense ratio. The appropriateness of a particular fund share class selection is dependent upon a range of different considerations, including but not limited to: the asset-based advisory fee that is charged, whether transaction charges are applied to the purchase or sale of funds, operational considerations associated with accessing or offering particular share classes (including the presence of selling agreements with the fund sponsors and NEIC's ability to access particular share classes through the custodian), share class eligibility requirements; and the availability of revenue sharing, distribution fees, shareholder servicing fees or other compensation associated with offering a particular class of shares.

Item 6: Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

NEIC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Description

NEIC generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

NEIC relationship minimum of \$250,000 of assets under management is required. The account size may be negotiable under certain circumstances. NEIC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

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

Methods of Analysis and Investment Strategies

NEICs analysis is based on over fifty years of academic research that investment returns are principally determined by asset allocation, not market

timing or stock selection. NEIC services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. Modern Portfolio Theory is a theory of finance which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. Modern Portfolio Theory is essentially the concept of diversification in investing, with the aim of selecting a collection of investment assets that has collectively lower risk than any individually asset.

NEIC adheres to the following principles: Markets are “efficient” and, for investing purposes, assets are fairly priced. Over periods of time investor’s long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. NEIC recommends broadly diversified portfolios, principally through the use of passively managed, asset class mutual funds. NEIC selects or recommends to client s portfolios of securities, principally broadly-traded open end mutual funds to implement this investment strategy.

NEIC may also recommend the use of long-term investment techniques such as dollar-cost averaging.

Investing in securities involves risk of loss that clients should be prepared to bear. Although all investments involve risk, NEIC’s investment advice seeks to limit risk through broad diversification among asset classes. NEIC’s investment philosophy is designed for investors who desire a buy and hold strategy. The frequent trading of securities increases brokerage and other transaction costs that NEIC’s strategy seeks to minimize.

Clients may hold or retain other types of assets as well, and NEIC may offer advice regarding those various assets as part of its services. NEIC’s 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.

NEIC receives supporting academic research from Dimensional Fund Advisors (DFA) and from other consultants, including economists affiliated with Dimensional Fund Advisors (DFA). NEIC utilizes DFA mutual funds in client portfolios with low holdings turnover. DFA provides historical market analysis, risk/return analysis, and continuing education for NEIC.

Investment Strategy and Method of Analysis Material Risks

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. NEIC relies on an analysis of the client’s financial objectives, current and estimated future resources, and tolerance for risk communicated during consultations and reviews. The client may change these objectives at any time. Each client consultation incorporates a Risk Tolerance Assessment that documents their objectives and their desired

investment strategy. In some cases a formal Investment policy may be executed.

NEIC's investment strategy is a hybrid of Modern Portfolio Theory and Efficient Markets Hypothesis; a passive management strategy, which refers to a buy-and-hold approach to asset management. The practice of passive management believes that no one can time the market. The focus for the investor should be how much can the investor risk to lose and how long they are willing to keep their money in the market to capture the gains that, as historical data has proven, will most likely come. The passive manager practices true diversity. The investor, based on risk assessment of the individual and on historical performance data, selects a variety of funds from fourteen to fifteen asset classes, not just two or three. Historically, while one asset class such as US Large Cap value is down, another asset class, such as International Small Cap Value might go up. Hence, the investor benefits from the market's gains while simultaneously off-setting the risk of substantial loss. Additionally, costs are decreased for the investor as trades are kept at a minimum.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

☐ *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

☐ *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

☐ *Inflation Risk:* When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

☐ *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

☐ *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

☐ *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

☐ *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

☐ *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings.

Self Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

The principals and advisory representatives of NEIC are also the principals of and are separately licensed as registered representatives of N.E. Private Client Advisors, Ltd. (NEPCA) a FINRA-member broker dealer affiliated with NEIC through common ownership and control.

Futures or Commodity Registration

Neither NEIC nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

The principals and advisory representatives of NEIC are also the principals of and are separately licensed as registered representatives of N.E. Private Client Advisors, Ltd. (NEPCA) , a FINRA –member broker dealer affiliated with NEIC through common ownership and control. The principals and advisory representatives of NEIC are also insurance agents or brokers for one or more insurance companies. As such, these affiliated persons, in their separate capacities as registered representatives of NEPCA and/or as insurance agents or brokers, will be able to effect securities transactions and/or purchase insurance and insurance-related investment products for clients, for which they will receive separate, yet customary compensation. Clients are not under any obligation to separately engage these affiliated persons when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

New England Pension Plan Systems, LLC (hereinafter, NEPPS) a third-party pension plan administrator and sponsor of a web-based portal providing plan participants access to their accounts, is also affiliated with NEIC through common ownership and control. NEPPS does not provide specific investment advice to any person. The web-based portal sponsored by NEPPS provides access to mutual funds and other investments made available to plan participants by the plan sponsor only. NEPPS may refer plan sponsors in need of advisory services to NEIC. In addition, NEIC may refer clients in need of third party administrative services to NEPPS. However, there are no referral fee arrangements between NEPPS and NEIC for these recommendations. Third-party administrative services provided by NEPPS are separate and distinct from the advisory services provided by NEIC and are provided for separate and typical compensation. No NEIC client is obligated to use NEPPS for any third-party administrative services, and no client of NEPPS is obligated to utilize the advisory services of NEIC. Sponsors or trustees of pension, profit-sharing, 401(k), IRA or other client accounts subject to the provisions of ERISA or the prohibited transaction provisions of the Internal Revenue Code are solely responsible for determining whether or not to engage the services of NEPPS.

NEIC's advisory fees will be offset for compensation earned by NEPPS (or by NEIC affiliated persons providing services through NEPPS) from pension, profit sharing, 401(k), IRA or other client accounts where to do otherwise would constitute a prohibited transaction under the provisions of ERISA or the Internal Revenue Code and where an exemption from such prohibition is not otherwise applicable.

While the principals and advisory representatives of NEIC endeavor at all times to put the interests of clients first as part of NEIC's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of

interest and may affect the judgment of these persons when making recommendations.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

NEIC does not recommend or select other investment advisors.

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

Code of Ethics Description

The employees of NEIC have committed to a Code of Ethics. The purpose of our Code of Ethics is to ensure that when employees buy or sell securities for their personal account, they do not create actual or potential conflict with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

New England Investment Consultants, Ltd has a high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

NEIC and its employees do not recommend to clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

NEIC and its employees may buy or sell securities that are also held by clients. In order to avoid potential conflicts of interest such as heading away of client trades, employees are required to disclose all reportable securities transactions as well as provide NEIC with copies of their brokerage statements.

The Chief Compliance Officer of NEIC is Sergio A. De Curtis MBA, ARPS, AIF . He reviews all employee trades each quarter. The personal trading reviews

ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment. Since most employee trades are in products such as mutual funds, government securities, bonds or are small in size, they do not impact the securities markets.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

NEIC does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

As NEIC does not have discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct NEIC as to the broker dealer to be used. NEIC may recommend the use of a particular broker-dealer or may utilize a broker dealer of the client's choosing. NEIC will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. NEIC relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by NEIC. NEIC directs clients to T.D. Ameritrade, Charles Schwab & Co, Inc or Fidelity Brokerage Services, LLC each an unaffiliated FINRA member broker dealer or through N.E. Private Client Advisors, Ltd (NEPCA) a FINRA member broker dealer affiliated with NEIC through common ownership and control. Clients should note, while NEIC has a reasonable belief that T.D. Ameritrade, Schwab, Fidelity and NEPCA are able to obtain best execution and competitive prices, NEIC will not be independently seeking best execution price capability through other broker dealers. Furthermore, clients directing the use of NEPCA should be aware that, because the principals and advisory representatives of NEIC are also the principals and registered representatives of NEPCA, commissions and/or other compensation earned on transactions in the client's account(s) will inure to the benefit of these individuals. In addition for trades executed via NEPCA, the affiliated broker dealer may receive a servicing fee of \$3 ticket charge for each trade executed. This handling fee is in addition to the advisory fees assessed. The receipt of additional compensation creates an inherent conflict of interest. Clients of NEIC, however, are under no obligation to utilize the brokerage services of NEPCA.

☐ *Directed Brokerage*

In circumstances where a client directs NEIC to use a certain broker-dealer, NEIC still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: NEIC's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among

clients, and potential conflicts of interests arising from brokerage firm referrals.

☐ *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. Currently NEIC only provides non- discretionary management to clients. NEIC reviews the execution of trades at each custodian each quarter.

☐ *Soft Dollar Arrangements*

NEIC utilizes the services of custodial broker dealers. Economic benefits are received by NEIC which would not be received if NEIC did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to NEIC's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

Aggregating Securities Transactions for Client Accounts

NEIC may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple accounts. If a block trades cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. For example, a partial fill will generally be filled pro-rata among participating accounts. Prior to entry of a block trade, a written pre-allocation will be generated which identifies the group of client accounts participating in the order.

Changes in allocation prior to final allocation may be made for good cause provided that all client accounts receive fair and equitable treatment. A written explanation of the reason for any material change in the allocation must be provided to and approved by the Compliance Officer no later than the morning following the execution of the trade. If the change in the allocation is the result of a condition that exists or a change in the client's account outside of the portfolio manager's control, then approval by the Compliance Officer is not required.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by Investment Advisor Representatives of NEIC. Account reviews are performed more frequently when market conditions dictate. Financial planning relationships with clients are monitored on an ongoing basis to ensure the recommendations made are within the scope of the plan remain suitable. The advisor will meet with the clients on at least an annual basis to secure updated information relating to all planning clients.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of client's accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly for managed accounts. Account reports are issued by the Advisor's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

NEIC does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

NEIC does not compensate for client referrals.

Item 15: Custody

Fee Debiting

Clients may authorize NEIC (in the client agreement) to debit fees directly from the client's account at the respective custodian. Client investment assets will be held with a custodian agreed upon by the client and NEIC. The custodian is advised in writing of the limitation of NEIC's access to the account. Each custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to NEIC

First Party Money Transfers

Clients may provide NEIC with written ongoing authorization to wire money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e. a client's bank account). A copy of this

authorization is provided to the qualified custodian. The authorization includes the client's account number(s) at the outside financial institution(s) as required.

Third Party Money Transfers

Clients may provide NEIC with a standing letter of authorization or specific letter of instruction.(or similar asset transfer authorization) which allows NEIC to disburse funds on behalf of clients to third parties. NEIC ensures the following conditions are in place when deemed to have custody via third party money movement:

1. The client provides a Written Authorization to the custodian that includes all appropriate information as to how the transfer should be directed;
2. The Written Authorization includes instruction to direct transfers to the third party either on a specified schedule or from time to time;
3. Appropriate verification is performed by the custodian, along with a transfer of funds notice to the client promptly after each transfer;
4. The client may terminate or change the instruction to the custodian;
5. NEIC has no authority or ability to designate or change any information about the third party contained in the instruction;
6. NEIC maintains records verifying if the third party is a related party of the Firm, the account number and specific destination of such transfer is for the respective client account / household as instructed in the letter of instruction.
7. The custodian sends the client a written initial notice confirming the instruction and an annual written confirmation thereafter.

Account Statements

All assets are held at qualified custodians, which means, the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to review the account statements received directly from their custodians for accuracy or errors.

Item 16: Investment Discretion

Discretionary Authority for Trading

Clients may grant New England Investment Consultants, Ltd. complete discretion over the selection and amount of securities to be bought or sold for their account (within the parameters established by their Advisory Agreement) without obtaining their consent or approval. Currently NEIC is not providing discretionary management to any clients. As a firm, NEIC has capability to manage with discretion. However, these purchases may be subject to specified investment objectives and guidelines. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.

Discretionary authority will only be authorized upon full disclosure to the client and by that client specifically authorizing said authority through the execution of

an Investment Advisory Agreement. In the event that NEIC provides discretionary management services to a client. All discretionary trades made by New England Investment Consultants, Ltd on behalf of their discretionary accounts (clients) will be in accordance with that client's investment objectives and goals.

Our primary objective in 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. New England Investment Consultants, Ltd. 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. We will not necessarily pay the lowest commission or commission equivalent. 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.

Item 17: Voting Client Securities

Proxy Votes

NEIC does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, NEIC will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

Balance Sheet

NEIC is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

NEIC has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither NEIC nor its management has had any bankruptcy petitions in the last ten years.

There is no other applicable information to be reported in this item with regard to performance-based fees as NEIC does not charge fees based on a share of capital gains on or the capital appreciation of the assets of a client. Sergio A DeCurtis, the principal and management person of NEIC has not been involved in events relating to liability in a civil, self-regulatory organization, or administrative proceeding. Please see the attached Brochure Supplements (Form ADV Part 2B) for information about the education and business background of Sergio A. DeCurtis.

Neither NEIC nor its management person has any relationship or arrangement with any issuer of securities.

Privacy Policy

Effective: October 2019

Our Commitment to You

New England Investment Consultants, Ltd. ("NEIC" or the "Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. NEIC (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we will do everything we can to maintain that trust.

NEIC does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: <ul style="list-style-type: none"> • Processing transactions; • General account maintenance; • Responding to regulators or legal investigations; and • Credit reporting, etc. 	NEIC may share this information.	Clients cannot limit the Advisor's ability to share.
Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	NEIC may share this information.	Clients cannot limit the Advisor's ability to share.
Marketing Purposes NEIC does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where NEIC or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	NEIC does not share personal information.	Clients cannot limit the Advisor's ability to share.
Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	NEIC does share personal information.	Clients can limit the Advisor's ability to share.
Information About Former Clients NEIC does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	NEIC does not share personal information regarding former clients	Clients can limit the Advisor's ability to share.

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about NEIC's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

State specific regulations

Massachusetts

In response to a Massachusetts law, clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (401) 274-5000 or via email at service@newenglandpension.com.

**Investment Advisor Brochure Supplement
(Form ADV Part 2B)**



**New England
Investment Consultants, Ltd.**

**Sergio A DeCurtis
New England Investment Consultants, Ltd.**

790 North Main St. Providence, Rhode Island 02904
401-274-5000

March 30, 2020

This Brochure Supplement provides information about Sergio A DeCurtis that supplements the New England Investment Consultants, Ltd. (NEIC) Brochure. You should have received a copy of that Brochure. Please contact Sergio A. DeCurtis, Chief Compliance Officer, if you did not receive New England Investment Consultants, Ltd. Brochure or if you have any questions about the contents of this supplement.

Education and Business Standards

Sergio A De Curtis MBA, ARPS, AIF

Educational Background:

- ☐ Date of birth: 1969
- ☐ Graduated cum laude from Providence College BS in Finance/Accounting 1991
- ☐ Graduated cum laude from Providence College with a MBA in Finance 1992
- ☐ ARPS (Accredited Retirement Plan Specialist) designation granted by
- ☐ The Society of Professional Administrators and Record-keepers, 2003
- ☐ AIF (Accredited Investment Fiduciary) designation granted by fi360 global Fiduciary Standards

Business Experience:

- ☐ President New England Investment Consultants, Ltd.; 2006-Present
- ☐ Registered Principal/ Chief Compliance Officer N.E. Private Client Advisors, Ltd from 8/2004 to present
- ☐ Managing Member New England Pension Plan Systems, LLC 1992 to present
- ☐ Investment Specialist / Registered Representative/ Financial Advisor New England Securities 1990 to 2006

Item 3 Disciplinary Information

None to report

Item 4 Other Business Activities

President, Sergio A DeCurtis MBA, ARPS, AIF has a financial industry affiliated business as registered representative of N. E. Private Client Advisors, Ltd a broker dealer member of FINRA, as a principal of New England Pension Plan Systems, LLC a third party administrator and as an insurance broker/ agent. From time to time, he will offer clients advice or products from those activities. He may receive separate yet typical compensation in the form of commissions for such services or the sale of insurance products.

These practices represent potential conflicts of interest because it gives Mr. DeCurtis an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that clients are not required to utilize NEPCA as a broker dealer, NEPPS as a third party administrator or purchase any insurance related products. Clients have the option to utilize another broker dealer, utilize another third-party administrator

or purchase products through another insurance broker/ agent of their choosing.

Item 5 Additional Compensation

President Sergio A DeCurtis does not receive any performance based fees.

Item 6 Supervision

Since Mr. De Curtis is the sole proprietor and investment adviser representative of New England Investment Consultants, Ltd. he is ultimately responsible for all supervision and formulation and monitoring of investment advice offered to clients.