

ACCESS FIDUCIARY SERVICES LLC

FORM ADV PART 2A FIRM BROCHURE May 17, 2021

This brochure provides information about the qualifications and business practices of Access Fiduciary Services LLC (“AFS”) and its registered investment adviser representatives. Any questions about the contents of this brochure may be directed to AFS by calling 202-302-7117 or by emailing Michael Halloran, Chief Compliance Officer, at halloran.michael@gmail.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration does not imply a certain level of skill or training. Additional information about AFS also is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. AFS’s CRD number is 311558.

ITEM 2 MATERIAL CHANGES

This version of Part 2A of Form ADV (“Firm Brochure”) dated **May 17, 2021** is our other than annual brochure document. It contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business that could affect a client’s relationship with us. We are providing this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940, which requires a registered investment adviser to provide a written disclosure statement upon entering into an advisory relationship.

Material Changes Since the Last Update:

1. Item 10 was updated to reflect relationship with AFS management and the non-affiliated advisory firm Shepherd Kaplan.
2. Item 10 was updated to clarify the relationship between Access Retirement Solutions, LLC, Access Plans, LLC and the Firm.
3. Item 7 was updated to clarify that there is no minimum account size for participants enrolled in the PEP.
4. Item 8 was amended to remove references to educational seminars. AFS does not intend to provide any educational materials to plan participants.

Full Brochure Available:

Clients shall receive annually an offer to deliver the Firm Brochure. Additionally, we will provide a new version of the Firm Brochure as necessary when updates or new information are added, at any time, without charge. To request a complete copy of our Firm Brochure, contact us by telephone at 202-302-7117 or by email to halloran.michael@gmail.com.

ITEM 3 TABLE OF CONTENTS

ITEM 1	COVER PAGE.....	1
ITEM 2	MATERIAL CHANGES	2
ITEM 3	TABLE OF CONTENTS	3
ITEM 4	ADVISORY SERVICES	4
ITEM 5	FEES AND COMPENSATION	6
ITEM 6	PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT	7
ITEM 7	TYPES OF CLIENTS	7
ITEM 8	METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	7
ITEM 9	DISCIPLINARY INFORMATION	10
ITEM 10	OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	10
ITEM 11	CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING	11
ITEM 12	BROKERAGE PRACTICES.....	12
ITEM 13	REVIEW OF ACCOUNTS.....	13
ITEM 14	CLIENT REFERRALS AND OTHER COMPENSATION.....	14
ITEM 15	CUSTODY	14
ITEM 16	INVESTMENT DISCRETION.....	14
ITEM 17	VOTING CLIENT SECURITIES.....	15
ITEM 18	FINANCIAL INFORMATION	15
ITEM 19	REQUIREMENTS FOR STATE REGISTERED ADVISERS.....	15

ITEM 4 ADVISORY SERVICES

A. FIRM DESCRIPTION

Access Fiduciary Services LLC (“AFS” or the “Firm”) is as an investment advisory firm registered with the Securities and Exchange Commission (“SEC”). The Firm is no longer eligible for registration with the SEC and is in the process of registering with the State of Massachusetts. The Firm is a newly organized limited liability company formed under the laws of Delaware. AFS is located in Boston, Massachusetts. AFS is wholly owned by Access Retirement Solutions, LLC (“ARS”). ARS is owned equally by AFS Managing Members Heath Miller and Michael Halloran. Michael Halloran is also the Chief Compliance Officer and only investment advisor representative of the Firm.

B. TYPES OF ADVISORY SERVICES

The SECURE Act enacted in December of 2019 provided the creation of an entirely new retirement vehicle called a Pooled Employer Plan (“PEP”). A PEP is a single 401(k) plan that is shared by unrelated employers. These plans or PEPs are scheduled to become available by January 1, 2021 and are designed to provide unrelated employers the opportunity to take advantage of lower fees and better service typically associated with services offered by larger employers. PEPs are expected to be largely sponsored by a third-party referred to as a Pooled Plan Provider (“PPP”), though the sponsor of a PEP does not have to be the PPP. This PPP must be designated by the PEP as the fiduciary, the plan administrator as well as the entity responsible for administrative tasks. The PPP’s responsibility is to verify that the PEP is administered in accordance with The Employee Retirement Income Security Act of 1974 (“ERISA”) requirements (ERISA Section 412) as well as the Department of Labor (“DOL”).

AFS’ affiliate, Access Plans LLC (“AP”), is the sponsor of the PEPs. AFS expressly acknowledges our fiduciary status regarding investment related matters that meet or exceed the standards set by ERISA and DOL. We also acknowledge that the requirements set forth by the Setting Every Community Up for Retirement Enhancement (“SECURE”) Act require registration of the PPP with the Treasury Department as well as the Internal Revenue Service. While AFS is not responsible for ensuring the PPP is properly registered, AFS does independently verify that such registration has appropriately been completed.

As an ERISA fiduciary, we have a defined set of obligations, which include: solely acting in the interest of the PEP participants and their beneficiaries with the exclusive purpose of providing plan benefits; acting with care, skill, prudence and diligence that a prudent expert under similar circumstances would use; diversifying the PEP assets in a way that minimizes the risk of large losses; and acting in accordance with the terms of the PEP’s documents. As an ERISA fiduciary, the Firm will not manage assets held in individual accounts and we will not advise Plan Participants on whether they should or should not open or

close a self-directed brokerage account, nor do we provide advice on purchasing, holding, or selling any securities held.

Portfolio Selection Service:

The Firm will provide a menu of investments being offered in the PEPs sponsored by the third-party affiliate, AP. The services associated with the provided menu will include identifying levels of risk, identifying return and liquidity objectives, and establishing an investment policy. Participants will be able to choose a managed portfolio or create a diversified portfolio from the investments provided. The investments offered will include a description with a profile of the investment's most suitable participants.

An employer is responsible for electing to participate in a PEP that is sponsored by AP. AP, as the sponsor of the PEP has the authority to designate the named fiduciaries of the PEP. AFS is responsible for prudently monitoring the ongoing performance of the PEP fiduciaries that are compensated directly or indirectly by each PEP. Prudence generally requires evaluating the quality of the services provided by the PEP's fiduciaries, as well as the reasonableness of the fees and expenses charged for those services. Prudence would not mandate selection of the lowest cost provider or the best performing provider. Both AFS and an employer may reasonably factor into their respective decisions the various qualitative considerations that are important or relevant to the needs of a PEP's participants, such as PEP design and features, educational resources and other services offered under the PEP. The employer may also consider factors that it considers important, such as familiarity with the PEP sponsor and convenience, as long as the decision is ultimately driven by what is in the best interests of its employees.

Fiduciary Monitoring Service:

With respect to each PEP sponsored by AP, AFS is designated in the PEP document as the named fiduciary responsible for monitoring the ongoing performance of those PEP fiduciaries that are compensated by the PEP.

The duty of prudence requires a fiduciary making investment decisions to have the requisite expertise for the investment decisions at hand.

For PEPs sponsored by AP, employers are outsourcing this ERISA fiduciary role to the Firm. As a named fiduciary for the PEPs sponsored by AP, we regularly monitor those service providers that are compensated directly or indirectly by the PEPs. Monitoring services include but are not limited to the following: evaluating notices received from the service providers about changes in compensation and fees; reviewing performance and assessing service providers; evaluating various reports given by service providers; discussing policies and procedures; and following up on participant complaints.

C. TAILORED RELATIONSHIPS

The Firm offers the same suite of services to all of its PEP clients. The portfolio selection service offered by the Firm are based on the needs of the PEP participants, their financial situation and risk tolerance.

D. WRAP FEE PROGRAMS

The Firm does not participate in and is not a sponsor of wrap fee programs.

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a “bundled” form. In exchange for these “bundled” services, the clients pay an all-inclusive (or “wrap”) fee determined as a percentage of the assets held in the wrap account.

E. ASSETS UNDER MANAGEMENT

When calculating regulatory assets under management, an Investment Adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services.

As of December 31, 2020, the Firm reports \$0 in client assets on a discretionary basis and \$0 on a non-discretionary basis.

ITEM 5 FEES AND COMPENSATION

A. DESCRIPTION AND BILLING

The Firm will be paid twenty-five percent (25%) of the subscription fee paid to AFS’ affiliate AP, which will serve as the sole sponsor of the PEPs that AFS will service. AP has an asset-based subscription fee with a minimum and maximum, however for limited size employer groups, AP charges its subscription fee on a per participant basis. The participating employer will be billed a quarterly subscription fee that enables them to AFS the PEPs sponsored by AP. The asset-based subscription fee will range from 0.02% to .04% of assets under management. Any management fees owed and due will be paid by the participating employers directly. No PEP funds will be used to pay for the subscription fee.

OTHER FEES AND PAYMENTS

There may be additional fees or charges that result from the maintenance of or trading within a PEP sub-account. These are fees that are imposed by third parties in connection with investments made through a PEP participant’s account, including but not limited to, no-load mutual fund 12(b)-1 distribution fees, and

certain deferred sales charges on previously purchased mutual funds. These expenses may include management fees, custodian fees, brokerage commission, and legal and accounting fees.

B. REFUND AND TERMINATION POLICY

The PEP sponsor may terminate its agreement with AFS upon written notice to AFS. Upon termination, the management fee for any partial period shall be prorated and any unearned amount shall be refunded to the client as of the effective date of the termination when requested in a written communication to the Firm.

C. OTHER COMPENSATION

The Firm will not receive any other compensation.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

A. PERFORMANCE-BASED FEES

Neither the Firm nor any of its supervised persons accept performance-based fees. Performance-based fees are fees based on a share of capital gains on, or capital appreciation of the assets of the client.

B. SIDE-BY-SIDE MANAGEMENT

Neither the Firm nor any of its supervised persons participate in side-by-side management. Side-by-side managements refers to the practice of managing accounts that are charged a performance-based fee as well as charged another type of fee, such as a flat fee, hourly fee, or an asset-based fee.

ITEM 7 TYPES OF CLIENTS

Our Firm provides services to the PEPs sponsored by our affiliate, AP. AFS is designated by the PEP documents as the fiduciary responsible for selecting the investments that are made available to the PEP participants.

There is no account minimum for any participant enrolled in the PEP.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS

AFS utilizes a fundamental method of analysis. Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For AFS, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation, and financial strength in relation to the asset class concentrations and risk

exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

B. INVESTMENT STRATEGIES

AFS manages the assets of the PEPs on a discretionary basis. AFS primarily selects various mutual funds in order to provide a menu of funds to be offered to PEP participants in accordance with the PEP's stated investment objectives. AFS has developed an investment policy statement which determines the various factors that may impact the PEP participants. AFS ensures that the PEP fund menu is suitable for the PEP's investment needs, goals, objectives, and risk tolerance.

C. RISK OF LOSS

PEP participants need to be aware that investing in securities involves risk of loss of the principal. Every method of analysis has its own inherent risks. To perform an accurate market analysis, the Firm must have access to current/new market information. The Firm has no control over the dissemination rate of market information; therefore, certain analyses may be compiled with outdated market information, severely limiting the value of the Firm's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Firm) will be profitable or equal any specific performance level(s). The Firm does not represent, warrant, or imply that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Notwithstanding the Firm's method of analysis or investment strategy, the assets within the PEP investment menu are subject to the risk of devaluation or loss. The PEP participants should be aware that many different events can affect the value of the PEP's assets or portfolio including, but not limited to, changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

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

PEP participants 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 will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.

Prepayment Risk: The returns on the collateral for the deal can change dramatically at times if the debtors prepay the loans earlier than scheduled.

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: This risk is associated with a particular industry or a particular company within an industry.

Liquidity Risk: Liquidity is the ability to convert an investment into cash readily. 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.

Risk Factors relevant to specific securities utilized include:

Equity Securities: The value of the equity securities are subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and riskier than some other forms of investment.

Mutual Fund Shares: Some of the risks of investing in mutual fund shares include: (i) the price to invest in mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads), (ii) investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs, and (iii) investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

Fixed Income Securities: Prices of fixed income securities tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect fixed-income security prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest

rates. For example, securities with longer maturities sometimes offer higher yields but are subject to greater price shifts as a result of interest rate changes than debt securities with shorter maturities. Some fixed income securities give the issuer the option to call, or redeem, the securities before their maturity dates. If an issuer calls its security during a time of declining interest rates, we might have to reinvest the proceeds in an investment offering a lower yield, and therefore might not benefit from any increase in value as a result of declining interest rates. During periods of market illiquidity or rising interest rates, prices of callable issues are subject to increased price fluctuation.

While this information provides a synopsis of the events that may affect a PEP participant's investments, this listing is not exhaustive. Although the Firm's methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. PEP participants should understand that there are inherent risks associated with investing and depending on the risk occurrence; clients may suffer LOSS OF ALL OR PART OF THE CLIENT'S PRINCIPAL INVESTMENT.

D. RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES

The Firm's investment strategies primarily rely on mutual funds.

ITEM 9 DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that are material to a client's or prospective client's evaluation of the Firm or the integrity of the Firm's management. The Firm nor any of its supervised persons has been involved in legal or disciplinary events that are related to past or present investment clients.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. FINANCIAL INDUSTRY ACTIVITIES

The Firm is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of the Firm's management or supervised persons is a registered representative of, nor has an application pending to register as a representative of, a broker-dealer.

B. FINANCIAL INDUSTRY AFFILIATIONS

The Firm is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, the Firm's

management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

The Firm is owned by Access Retirement Solutions, LLC (“ARS”), a holding company that also owns the PEP sponsor Access Plans, LLC (“AP”). ARS sells the subscription service to the PEP plans sponsored by AP. Our Firm only provides services to the PEPs sponsored by our affiliate, AP. AFS is designated by the PEP documents as the fiduciary responsible for selecting the investments that are made available to the PEP participants. This can create a conflict because PEP participants are only able to enroll in a PEP where AFS and AP are the fiduciary and plan sponsor. AP does retain the ability to terminate the services provided by AFS. Neither AP or AFS takes any compensation from the plan participants. All employers who elect to enroll in the PEP receive disclosure of the affiliation between ARS, AP and AFS.

The management team of AFS are affiliated with Shepard Kaplan Krochuk (“SK”) an SEC Registered Investment Advisory firm. Michael Halloran provides investment advisory services to individual client and Heath Miller acts as ERISA counsel on behalf of Shepard Kaplan, LLC the wealth management division. Michael Halloran and AFS do not provide any individualized investment advice to PEP participants. There is no solicitor, referral or other arrangement between SK and AFS.

D. OTHER INVESTMENT ADVISORS

The Firm does not have any material arrangements with other investment advisers that are material to its advisory clients.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION OF CODE OF ETHICS

All employees of the Firm must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, the Firm has adopted a Code of Ethics in its Employee Policies and Procedures Manual to specify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures relating to personal trading by the Firm’s personnel. The Firm’s Code of Ethics in its Employee Policies and Procedures Manual, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to AP, any participating employer or any PEP participant upon request.

B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

The Firm does not recommend or effect transactions in securities in which any related person may have material financial interest.

C. PROPRIETARY / SIMULTANEOUS TRADING

At times, the Firm or its affiliated persons may buy or sell securities for its own accounts that it has also selected for the PEPs. However, any purchase or sale of a security by the Firm or a related person will be subject to the Firm's fiduciary duty to the PEPs and PEP participants. From time to time, representatives of the Firm may buy or sell securities for themselves at or around the same time as the Firm's client accounts. In any instance where similar securities are bought or sold, the Firm will uphold its fiduciary duty by always transacting on behalf of the client before transacting for its own benefit. The Firm will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, the Firm will monitor its proprietary and personal trading reports for adherence to its Code of Ethics.

ITEM 12 BROKERAGE PRACTICES

A. SELECTION AND RECOMMENDATION

The custodian is designated by the PEP sponsor and specified in each PEP. AFS will be responsible for ensuring that the costs and services provided by the custodian are appropriate and align with an obligation to offer the PEP best execution.

B. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

The Firm does not currently receive "soft dollars."

Under "soft dollar" arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items. These soft dollar benefits are attributed to the investment advisor by reducing its expenses; however, the amount of the fee paid to the investment advisor by the client would not be reduced. Making allocations to brokerage businesses with soft dollar arrangements could enhance the ability to obtain research, optimal execution and other benefits on behalf of clients.

C. BROKERAGE FOR CLIENT REFFERALS

At this time, the Firm does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

D. DIRECTED BROKERAGE

The custodian is designated by the PEP sponsor and specified in the PEP. In order to participate in the PEP, participants will have their assets held by the PEP's choice of custodian.

E. ASSET AGGREGATION

To the extent it applies and is practical, the Firm will aggregate sale and purchase orders of securities ("block trading") for sub-accounts within the PEP with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to PEP sub-accounts in a systematic non-preferential manner.

ITEM 13 REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

The Firm reviews PEP account activity on an on-going basis with a formal review at least quarterly. The reviews consist of determining whether a PEP's investment goals and objectives are aligned with the Firm's investment strategies. The reviews are overseen by Michael Halloran, Chief Compliance Officer of AFS, with the involvement of the individual advisors.

B. INTERMITTENT REVIEW FACTORS

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, health crises such as the pandemic, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Participants are advised to notify their employers promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

C. REPORTS

Participants may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian and will be provided by the custodian at least quarterly.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS FROM OTHERS

The Firm does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

B. COMPENSATION TO UNAFFILIATED THIRD PARTIES

The Firm does not compensate, directly or indirectly any person who is not a supervised person of the Firm for client referrals.

ITEM 15 CUSTODY

A. CUSTODIAN OF ASSETS

Custody means holding, directly or indirectly, participant funds or securities, or having any authority to obtain possession of them.

The Firm will not maintain physical possession of the PEP's funds and securities. Instead, the PEP's funds and securities are held by the qualified custodian designated in each PEP by the PEP sponsor and monitored by AFS.

B. ACCOUNT STATEMENTS

Although the Firm monitors various service providers, the PEP participant's statements will be mailed or made available electronically by the broker-dealer, PEP's custodian or the PEP's recordkeeper. When the participant receives these statements, they should be reviewed carefully. Participants should compare asset values, holdings, and fees on the statement to that in the account statement issued the previous period.

ITEM 16 INVESTMENT DISCRETION

The Firm's customary procedure is to have full discretionary authority in order to supervise the investments offered in the menu. Participating employers recognize this authority by electing to participate in a PEP, which designates the Firm as such PEP's investment manager. This authority is for the purpose of making and implementing investment decisions, without the participating employer's prior consultation. All investment decisions are made in accordance with the investment objectives outlined in each of the PEP's investment policy statement. The Firm's discretionary authority does not give authority to take or have possession of any assets in the participating employer's account or to direct delivery of any securities or payment of any funds held in the account to the Firm.

ITEM 17 VOTING CLIENT SECURITIES

The Firm will not vote proxies which are solicited for securities held in participant accounts. The Firm will not be required to render any advice with respect to the voting of proxies. Furthermore, The Firm will not take any action or render any advice with respect to any securities held in any PEPs that are named in or subject to class action lawsuits. The Firm will, however, forward to the PPP any information received by the Firm regarding class action legal matters involving any security held in the PEP.

ITEM 18 FINANCIAL INFORMATION

A. BALANCE SHEET REQUIREMENT

The Firm is not the qualified custodian for client funds or securities and does not require prepayment of fees.

B. FINANCIAL CONDITION

The Firm does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. BANKRUPTCY PETITION

The Firm has not been the subject of a bankruptcy petition at any time during the last 10 years.

ITEM 19 REQUIREMENTS FOR STATE REGISTERED ADVISERS

A. BACKGROUNDS OF PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

Please see our Supplement Brochure for the education and business background of the Firm's executive officers and management persons.

B. OTHER BUSINESS ACTIVITIES

Please see Item 10 of this Firm Brochure and Item 4 of the Brochure Supplement.

C. PERFORMANCE-BASED COMPENSATION AND DEGREE OF RISK TO CLIENTS

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

D. DISCIPLINARY REPORTING DISCLOSURE

Neither the Firm nor its management have civil, self-regulatory organization, or arbitration proceedings to report under this section. Clients may obtain the disciplinary history of AFS or its representatives from the Massachusetts Securities Division upon request by contacting (617) 727-3548 or emailing msd@sec.state.ma.us.

E. MATERIAL RELATIONSHIPS OR ARRANGEMENTS WITH SECURITIES ISSUERS

Please see Item 10 of this Firm Brochure. Neither the Firm nor its management has any additional relationship or arrangement with any issuer of securities to report under this section.
