



## **Item 1 – Cover Page**

Firm Brochure

(Part 2A of Form ADV)

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March 2022

This brochure provides information about the qualifications and business practices of Sustainable Investment Solutions, LLC d/b/a Financial Solutions Associates. If you have any questions about the contents of this brochure, please contact us at (781) 251-0505 or [alex@financialsolutions.net](mailto:alex@financialsolutions.net). The information in this brochure has not been approved or verified by any state securities authority.

Additional information about us is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure is a new document prepared according to the SEC’s new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this item will discuss only specific material changes that are made to the brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC rules, we will ensure that you receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Since our last annual amendment filing on 03/24/2021, the following material changes have occurred:

- Our firm has clarified in Item 5 of this Brochure, how we bill on cash and cash equivalents held in client accounts. Further, please see Item 8 of this Brochure for more information on cash and cash equivalents.

We will further provide you with a new brochure as necessary based on changes or new information.

Our brochure may be requested by contacting Alexander E. Burke at (781) 251-0505 or [alex@financialsolutions.net](mailto:alex@financialsolutions.net). Our brochure is available on our web site [www.financialsolutions.net](http://www.financialsolutions.net). Additional information about Financial Solutions Associates is available on the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 4 – Advisory Business**

### **Firm Description**

In 2011 Financial Solutions Associates (“FSA”) organized as a limited liability company and is wholly owned by Alexander E. Burke. We are dedicated to providing individuals with a wide array of financial planning and investment advisory services. An initial consultation, which may be by telephone or teleconference, is offered free of charge to determine the extent to which investment management and financial planning services may be beneficial to the client.

### **Investment Management**

Investment management services involve the management of client funds using open-ended no-load mutual funds, exchange-traded funds, stocks, bonds, and other publicly offered securities traded for each client on a discretionary basis by the advisor. The advisor determines which investments each client will own and when they are bought and sold, without limitation, unless the client has imposed restrictions on investing in certain securities or types of securities. Currently, three different FSA investment models are offered and include: Aggressive, Balanced, and Conservative. The selection of an FSA investment model is determined by each client in consultation with the advisor. Client's individual goals, investment timeframe, and risk tolerance may be considered when a client chooses an investment model. The advisor has the discretion to change the asset allocation structure within each model at any time, but not to change a particular client's overall model unless that client revises their advisory agreement.

As of December 31, 2021, FSA managed \$130,598,885 on a discretionary basis for its investment management clients.

### **Financial Planning**

Financial planning services can include a detailed analysis of client's financial position, risk management, investment planning, income tax planning, retirement planning, estate planning and other mutually agreed upon financial planning issues. The advisor may determine, at their discretion, what level, and for which clients these services may be offered. Financial planning services do not include legal advice, legal document preparation or tax return preparation. Financial planning services may be offered to employees of certain companies for which we provide employee benefits. Financial planning fees may be negotiated for each contract and will vary depending upon the services required.

## **Item 5 – Fees and Compensation**

Financial planning services are offered on a flat or hourly fee basis to clients who are not interested in investment advisory services. Our maximum flat fee will not exceed \$10,000 and our hourly rate is \$300. These services are provided at no additional cost to existing clients who have investments being actively managed by the advisor. For managing investments, an asset management fee is assessed in advance each calendar quarter based on the value of the portfolio on the last day of the previous quarter. Our firm bills on cash unless otherwise agreed to in writing. Fees may be prorated for partial quarters but are not prorated for each capital contribution or withdrawal made during the applicable calendar quarter. Investment management fees are intended to compensate the advisor for services rendered and are in addition to and not part of, any other costs or transaction charges associated with the acquisition or ownership of assets.

The following fee schedule generally applies to assets managed by the advisor:

<b>Account Value</b>	<b>Per Quarter</b>	<b>Annualized</b>
\$0 to \$999,999	0.2500%	1.00%
\$1,000,000 to \$4,999,999	0.2125%	0.85%
\$5,000,000 +	0.1875%	0.75%

The specific manner in which fees are charged by FSA is established in a client's written agreement with FSA. Clients may authorize FSA to deduct asset management fees from their investment accounts. Clients may incur certain charges imposed by custodians, brokers, third party investment, such as custodial fees, odd-lot differentials, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions, via individual transaction charges. TD Ameritrade, Inc. ("TD Ameritrade") does not charge transaction fees for U.S. listed equities and exchange traded funds. Mutual funds and exchange traded funds also charge internal management fees, called an expense ratio, which are disclosed in a fund's prospectus. Such charges and fees exclusive of and in addition to FSA's fee, and FSA shall not receive any portion of these charges and fees.

Clients have five business days after signing an agreement to cancel it, without penalty. Cancellation notice can be in writing, verbal, or email. After five business days, clients may terminate the contract and all pre-paid fees, less costs for services already performed, and expenses incurred, will be refunded. Investment management fees are subject to negotiation at the advisor's discretion.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Financial Solutions Associates does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

#### **Item 7 – Types of Clients & Account Requirements**

Financial Solutions Associates provides portfolio management services to individuals as well as high net worth individuals. The minimum investment size for new clients is \$500,000. This may be altered at the advisor's discretion.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

Currently, three different FSA investment models are offered and include: Aggressive, Balanced, and Conservative. The selection of an FSA investment model is determined by each client. The advisor has the discretion to change the asset allocation structure within each model at any time. Each asset allocation model uses a range of securities selected based on fundamental analysis, technical analysis, cyclical analysis, and asset allocation modeling. Multiple asset classes of investment including equities, fixed income, and alternatives will be selected in varying percentages for each client depending on the model chosen. Individuals may hold investments including exchange traded, over-the-counter, foreign issued, municipal, and corporate debt securities, commercial paper, certificates of deposit, mutual fund shares, variable annuities, and government securities. Information about investments is gathered from a combination of financial publications inspections of corporate activities, research material prepared by third parties, corporate rating services, annual reports, prospectuses, and SEC filings. The particular securities used in an asset class may be changed after due diligence has been done in researching any new securities.

Investing in securities involves risk of loss that clients should be prepared to bear. Financial Solutions Associates does not guarantee performance or results. Clients may receive a prospectus for certain investments in their portfolio. The prospectus will outline the principle risks of investing in that particular security. Some of the risks may include:

**Fundamental Analysis:** The analysis of a business's financial statements (usually to analyze the business's assets, liabilities, and earnings), health, and its competitors and markets. When analyzing a stock, futures contract, or currency using fundamental analysis there are two basic approaches one can use: bottom up analysis and top down analysis. The terms are used to distinguish such analysis from other types of investment analysis, such as quantitative and technical. Fundamental analysis is performed on historical and present data, but with the goal of making financial forecasts. There are several possible objectives: (a) to conduct a company stock valuation and predict its probable price evolution; (b) to make a projection on its business performance; (c) to evaluate its management and make internal business decisions; (d) and/or to calculate its credit risk; and (e) to find out the intrinsic value of the share.

When the objective of the analysis is to determine what stock to buy and at what price, there are two basic methodologies investors rely upon: (a) Fundamental analysis maintains that markets may misprice a security in the short run but that the "correct" price will eventually be reached. Profits can be made by purchasing the mispriced security and then waiting for the market to recognize its "mistake" and reprice the security; and (b) Technical analysis maintains that all information is reflected already in the price of a security. Technical analysts analyze trends and believe that sentiment changes predate and predict trend changes. Investors' emotional responses to price movements lead to recognizable price chart patterns. Technical analysts also analyze historical trends to predict future price movement. Investors can use one or both of these different but complementary methods for stock picking. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Cash & Cash Equivalents:** Cash and cash equivalents generally refer to either United States dollars or highly liquid short-term debt instruments such as, but not limited to, treasury bills, bank CD's and commercial papers. Generally, these assets are considered nonproductive and will be exposed to inflation risk and considerable opportunity cost risk. Investments in cash and cash equivalents will generally return less than the advisory fee charged by our firm. Our firm may recommend cash and cash equivalents as part of our clients' asset allocation when deemed appropriate and in their best interest. Our firm considers cash and cash equivalents to be an asset class. Therefore, our firm assess an advisory fee on cash and cash equivalents unless indicated otherwise in writing.

- **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**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of FSA or the integrity of FSA's management. FSA has not been involved in any material, legal, or disciplinary events related to past or present investment clients.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

We have no other financial industry activities and affiliations to disclose.

#### **Item 11 – Code of Ethics**

The advisor maintains a Code of Ethics which is modeled on the CFP® Board's Code of Ethics which emphasizes the fiduciary duty advisors owe to their clients:

1. The advisor will act with honesty, integrity, competence, and diligence.
2. The advisor will act in the client's best interests.
3. The advisor will exercise due care.
4. The advisor will avoid or disclose and manage conflicts of interest.
5. The advisor will maintain the confidentiality and protect the privacy of client information.
6. The advisor will act in a manner that reflects positively on the financial planning profession and CFP® certification.

A full copy of our Code of Ethics will be provided to any client or prospective client upon request.

#### **Item 12 – Brokerage Practices**

FSA may recommend discount brokerage firms, though the broker-dealer for client transactions is ultimately up to the client, as recorded in Advisory Agreement. Our recommendation of any particular broker-dealer is based on the proven integrity and financial responsibility of the firm and

the best execution of orders at reasonable commission rates. FSA receives no fees or commissions from any broker-dealer or custodian.

FSA defines best execution as the best price that may be obtained on a trade consistent with the integrity and financial responsibility of the brokerage firm and the advisor's fiduciary responsibility to the client. FSA does not receive any portion of the transaction fees or commissions paid by the client to the brokerage firm on any trades.

FSA may be granted access to third party and/or proprietary research from broker-dealers and other investment companies because they serve as custodian for client assets. This may be considered a conflict of interest although the advisor may use this research in security selection to the benefit of all clients. Additionally, FSA uses its own research from a variety of sources, from which all clients benefit. FSA chooses custodians based solely on best execution.

FSA does not use soft dollar commissions to offset the cost of any research or services from broker-dealers. The only research or services used by FSA exclusive to a particular broker-dealer is offered to any investment advisor using that particular broker-dealer.

In the event that we can achieve best execution through aggregation of orders, we will choose to aggregate certain equity trades if and when it is in the best interest of a client.

### **Item 13 – Review of Accounts**

The advisor reviews accounts on an ongoing basis and makes changes for a variety of reasons, including: changes in client goals, the economy and investment markets, performance of securities, tax law changes, trends that may require rebalancing. Mr. Burke performs reviews personally.

Reporting is provided monthly by the custodian/investment companies and includes statements of positions, transactions, dividend/income activity, fee reporting, and cost basis reporting. Reviews of accounts are performed at least annually.

Performance reporting is provided quarterly by the advisor and includes: Time Weighted Rates of Return for various periods, summary of positions owned, and management fee invoice for the next period.

### **Item 14 – Referrals and Other Compensation**

FSA does not compensate nor receive compensation for any client referrals. FSA does not accept referral fees or "kickbacks" from other professionals when a prospect or client is referred to them. FSA shall consistently provide multiple options when a client requests a referral to another professional.

### **Item 15 – Custody**

#### **Deduction of Advisory Fees**

While our firm does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we are deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts, as further described below under "Third Party Money Movement." All our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. We urge our clients to carefully review these statements. Additionally, if our firm decides to send its own account statements to clients, such statements will include a legend that recommends the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to



raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

### **Third Party Money Movement**

On February 21, 2017, the SEC issued a no-action letter (“Letter”) with respect to Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client’s qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.  
The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### **Item 16 – Investment Discretion**

FSA receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client portfolio. When selecting securities and determining amounts, FSA observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to FSA in writing. The advisor has discretion to determine which securities are to be bought and sold, and the amount of securities to be bought and sold for each client, without any limitations, unless the client has issued specific instructions limiting this authority. Each client will appoint FSA as a limited power of attorney, authorizing FSA to make trades on their behalf when an account is opened.

### **Item 17 – Voting Securities**

SEC Rule 206(4)-6 requires investment advisers who have voting authority with respect to securities held in their clients’ accounts to monitor corporate actions and vote proxies in their clients’ best interests. The advisor is required by the SEC to adopt written policies and procedures, make those policies and procedures available to clients, and retain certain records with respect to proxy votes cast.

We consider proxy voting an important right of our clients as shareholders and believe that reasonable care and diligence must be taken to ensure that such rights are properly and timely exercised. When the advisor has discretion to vote the proxies of their clients, they will vote those proxies in their clients' best interests and in accordance with these policies and procedures. Clients may request a copy of our written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting our chief compliance officer, Alexander E. Burke by phone at (781) 251-0505 or email at alex@financialsolutions.net.

1. Policy for voting proxies.

All proxies received by our firm will be given to an advisor for processing. Advisor will vote proxies in the best interest of each particular client. A listing of each proxy voted will be updated at the time the proxy is voted. Proxies will generally be voted online unless custodian requires mailed form.

2. Proxies voting guidelines.

Where voting authority exists, proxies are voted by the firm in the best interests of clients on a case by case basis.

- (i) Description of whether (and, if so, how) our clients can direct our vote in a particular solicitation.

Our firm will either vote our clients proxy with full discretion, or our client will vote themselves.

- (ii) How we address conflicts of interest between our firm and clients are addressed with respect to voting their securities.

FSA recognizes that under certain circumstances there may be a conflict of interest between FSA and our clients. The advisor shall periodically inform other employees that they are under an obligation to be aware of the potential for conflicts of interest on the part of our firm with respect to voting proxies on behalf of funds, both as a result of the firm's employee's personal relationships and due to circumstances that may arise while conducting business, and to bring conflicts of interest of which they become aware to the attention of the proxy manager. The advisor shall not vote proxies relating to such issuers on behalf of client accounts until the advisor has determined that the conflict of interest is not material or a method of resolving such conflict of interest has been agreed upon by the chief compliance officer. A conflict of interest will be considered material to the extent that it is determined that such conflict has the potential to influence decision-making in voting a proxy. Materiality determinations will be based upon an assessment of the particular facts and circumstances. If an advisor determines that a conflict of interest is not material, the advisor may vote proxies notwithstanding the existence of a conflict. If the conflict of interest is determined to be material, the conflict shall be disclosed to the chief compliance officer and the advisor shall follow the instructions of the chief compliance officer. The firm shall keep a record of all materiality decisions and report them to the chief compliance officer on an annual basis.

- (iii) Description of how clients may obtain information from us about how we voted their securities.

The chief compliance officer will maintain files relating to our proxy voting procedures. Records will be maintained and preserved for five years from the end of the fiscal year during which the last entry was made on a record, with records for the last two years kept on premises. Records of the following will be included in the files:

- copies of these proxy voting policies and procedures, and any amendments thereto;
- a copy of each proxy statement that we receive, provided however that our firm may rely on obtaining a copy of proxy statements from the SEC's EDGAR system for those proxy statements that are available;
- a record of each vote cast;

-a copy of any document created that was material to making a decision how to vote proxies, or that memorializes that decision;

-a copy of each written client request for information on how the advisor voted such client's proxies, and a copy of any written response to any client request for information on how the advisor voted their proxies.

(iv) How clients may obtain a copy of proxy voting policies and procedures upon request. Clients may request a copy of the firm's written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting the Chief Compliance Officer, Alexander E. Burke by phone at (781) 251-0505 or email at [alex@financialsolutions.net](mailto:alex@financialsolutions.net).

(v) Whether the firm pays for proxy voting services with soft dollars or passes the cost on to clients through a supplement to the advisory fee.

FSA does not pay for proxy voting services with soft dollars. Also, FSA does not charge an additional fee to vote proxies.

### **Item 18 – Financial Information**

FSA does not have any financial impairment that will preclude the firm from meeting contractual and fiduciary commitments to clients.

A balance sheet is not required to be provided because FSA does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.