

Item 1: Cover Sheet

**FORM ADV PART 2A
INFORMATIONAL BROCHURE**



PIN Wealth, LLC

348 Park St, Suite 107
North Reading, MA 01864
781-239-1187

March 29, 2022

This brochure provides information about the qualifications and business practices of PIN Wealth, LLC, CRD# 316919. If you have any questions about the contents of this brochure, please contact us at 781-239-1187. 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.

PIN Wealth, LLC is registered as an Investment Adviser with the SEC. Our registration does not imply a certain level of skill or training.

Additional information about PIN Wealth, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Statement of Material Changes

In this Item, PIN is required to discuss any material changes that have been made to the brochure. There have been no material changes to PIN Wealth LLC's ADV Part 2A, Firm Brochure since the previous filing.

Item 3: Table of Contents

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INFORMATIONAL BROCHURE
PIN WEALTH, LLC

Item 4: Advisory Business

PIN Wealth, LLC (“PIN”) was formed in September, 2021. PIN is owned by David A. Knechtle, Joshua M. Wilson and Miranda J. Lazzara. Because PIN is a new entity, it currently reports no discretionary or non-discretionary Assets Under Management.

Investment Advisory Services

PIN offers clients customizable portfolios. The process begins with a risk tolerance approach. We interview clients and they interview us in return to ensure we are mutually a good fit. Clients will complete a risk tolerance questionnaire, a socially responsible questionnaire as well as a cash flow questionnaire. We will make recommendations based on the questionnaire and if the client agrees the relationship is formed. We then send a summary email detailing the next steps for a follow up meeting. During the follow-up meeting, we will discuss how impact investing works, the risk tolerance category the client fits into based on the questionnaire and answer any questions the client may have on the initial recommendations. Clients will execute an advisory agreement and be presented with all required disclosure brochures, their financial plan and an E-money log-in. Through E-money, we can produce cash flow analysis projecting how long client assets will last.

Investment advisory services may be provided on either a “discretionary” or “non-discretionary” basis. When a client engages the firm to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your investment objectives. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others, utilizing a separate account (third party) manager or keeping the proceeds in cash. You may at any time place reasonable restrictions on the types of investments we may use on your behalf, or on the allocations to each security type, though such restrictions may limit the potential performance of your portfolio. You will receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive statements directly from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as a written agreement that outlines the responsibilities of both the client and the firm.

In certain limited circumstances, and in the discretion of the firm, a client may engage the firm to provide investment management services on a non-discretionary basis. In such circumstances where the client has opened an account with their own investment choices, PIN will accommodate the client, however, the accounts are not monitored by PIN.

Financial Planning Services

As part of the portfolio management process, we develop financial plans for its clients at no additional cost.

In most cases, the client will supply us with information including income, investments, savings, insurance, age, the values the client would like to see advanced as part of their planning process, and many other items that are helpful to the firm in assessing financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you and compare your current financial situation with the goals you state. Once these are compared, we will create a financial

and/or investment plan to help you meet your goals, and work with you to educate you about household finances and investments.

The plan is intended to be a suggested way to achieve financial goals in keeping with the client's values. Not every plan will be the same for every client. Each one is specific to the client who requested it. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information we need. Also, your circumstances and needs may change as your engagement with us progresses. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

ERISA 3(38) Services

We provide discretionary investment management services to retirement plans qualified under section 401(a) of the Internal Revenue Code and subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). We have expertise in advising retirement plans and their participants regarding the proper and effective use of mutual funds for investing. For plan fiduciaries who enter into an agreement with PIN for these services, PIN serves as a discretionary investment manager to the Plan, as such term is defined in Section 3(38) of ERISA. We establish an investment policy for the Plan and select and monitor the investment options offered.

Other Services

We provide a holistic approach to all our clients whether they are a business or an individual. The services in the holistic approach include, but are not limited to, insurance planning, retirement plan establishment and ongoing oversight, private wealth and business wealth management, endowments and donor advised funds.

As of March 23, 2022, PIN Wealth, LLC managed a total of \$ 53,634,326 in assets under management on a discretionary basis.

Item 5: Fees and Compensation

A. Fees Charged

Investment Advisory Services

All individuals will be required to execute an agreement with PIN outlining the services to be performed, as well as the fees for those services. Clients are under no obligation at any time to engage or to continue to engage, PIN for investment services. If clients do not receive a copy of this brochure at least 48 hours prior to the execution of an Agreement, clients may terminate the agreement within the first five (5) business days without penalty.

We have a PIN Asset Management Fee Schedule as well as a Third-party Asset Manager Fee Schedule. Both schedule base the advisory fee on the market value of the assets under management and is calculated as follows:

PIN ASSET MANAGEMENT FEE SCHEDULE

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	1.50%
\$1,000,001 - \$2,000,000	1.25%
\$2,000,001 - \$5,000,000	1.00%
\$5,000,001 - \$10,000,000	.75%
\$10,000,001 - \$25,000,000	.50%
\$25,000,001 and Above	.30%

THIRD-PARTY ASSET MANAGER FEE SCHEDULE

Account Value	Annual Advisory Fee
\$0 - \$5,000,000	1.00%
\$5,000,001 - \$25,000,000	.75%
\$25,000,001 and Above	.30%

Fees are negotiable according to advisor discretion and if negotiated the fee will be a fixed fee.

The annual fees are prorated and paid in advance on a quarterly basis. The advisory fee is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the balance on the last day of the previous quarter. No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement. Advisory fees are directly debited from client accounts.

Financial Planning

Financial planning fees can be hourly, fixed fee basis (which may be per project or per month), or included with asset management services. Our hourly charge is between \$100 and \$500 per hour, depending on the professional working on the project. Fixed fees will typically be between \$3,500 and \$10,000, and in special circumstances, can be greater than \$10,000. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable and will depend on the anticipated complexity of your plan and the professional(s) working on the plan.

B. Fee Payment

As stated above, fees will be based on the assets under management. The fee is paid quarterly in advance and comes due on the first day of the calendar quarter of the stated billing cycle based on the balance on the last day of the previous quarter. In calculating the market value of a client's assets, assets allocated to cash or a cash proxy, such as a money market account, will be included in the calculation of assets under management. Once the calculation is made, fees will be debited from the account.

C. Other Fees

There are no additional fees payable to PIN. Clients referred to an Investment Manager will pay fees to that Investment Manager. There may or may not be additional fees or expenses to third parties or Investment Managers, depending on the Investment Manager and the agreement between that Investment Manager and their client. Clients should thoroughly and carefully review all materials from any Investment Manager prior to executing or otherwise entering into any agreement with an

Investment Manager. Clients may incur other expenses with the implementation of advice provided such as commissions, custodian fees, ETF or mutual fund expenses. None of these fees is payable to PIN.

Please make sure to read Item 10 of this informational brochure, where we discuss broker-dealer relationships.

D. Pro-rata Fees

If you become a client during a billing period, you will pay a management fee for the number of days left in that billing period. If you terminate our relationship during a billing period, you will be entitled to a refund of any pre-paid and unearned management fees for the remainder of the billing period. Once your notice of termination is received, we will refund the unearned fees to you in whatever way you direct (wire back to your account or check). Further, as discussed above, any deposits or withdrawals greater than \$25,000 will result in an adjusted fee calculation with respect to the account related to the deposit or withdrawal. Deposits will incur a pro-rated fee for the remainder of the billing period. Withdrawals will result in a pro-rata refund of the unearned fee with regard to the withdrawn amount. PIN will cease to perform services, including processing trades and distributions upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be “de-linked”, meaning they will no longer be visible to PIN and will become a retail account with the custodian.

E. Compensation for the Sale of Securities

Advisors of PIN Wealth, LLC may also be registered representatives of Purshe Kaplan Sterling Investments (“PKS”), a FINRA member broker-dealer. Because PKS supervises advisors’ activities as a registered representative of PKS, the relationship may be deemed material. However, PKS is not affiliated with PIN Wealth, LLC (hereinafter “PIN”) or considered a related party. PKS does not make investment decisions for client accounts. Advisors’ status as a registered representative enables them to receive customary commissions for the sales of various products, including variable annuity products. They may receive such a commission on the sale of a product he recommends to clients.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with PIN. PIN attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Item 6: Performance-Based Fees

PIN will not charge performance-based fees.

Item 7: Types of Clients

We generally provide advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

PIN does not have a specified minimum account size. Some clients who wish to access multiple asset management styles, specifically third-party managers, may be required to have an account minimum.

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

Methods of Analysis and Investment Strategies

Each client portfolio is separately managed. We have proprietary models where clients are invested according to that client's investment objective and social responsibility. Once each account's objectives are ascertained, PIN will develop a set of asset allocation guidelines. An asset allocation guideline is a percentage-based allocation among different types of assets like stocks, fixed income, or third-party managers with specific expertise (asset classes), or specific types of securities (large cap, mid-cap). For example, a client may have an asset allocation strategy that calls for 80% of the portfolio to be invested in equity securities and fixed income and the rest invested with third party managers. Within each main allocation may be sub-allocations. For example, a client with 80% in direct securities may have a mix of large cap, mid cap and small cap equities combined with mutual funds and fixed income, while another client's direct securities might be all in ETFs and mutual funds. Each client is managed individually.

The percentages in each asset type recommended by PIN are based on the typical behavior of that security type, individual securities we follow current market conditions, the client's current financial situation, financial goals, and the timeline to achieve those goals. Because PIN develops an investment strategy based on each client's personal situation and financial goals, each client's asset allocation guidelines may be similar to or different from another client. It is important to remember that because market conditions can vary greatly, asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary.

Assets may be managed through the use of a third-party manager or directly managed by a PIN professional, depending on the professional advisor with whom the client works as well as client needs. When managing assets directly, the securities recommended may include stocks, index funds, exchange traded funds, mutual funds, options and bonds.

Specific equity and fixed income securities are chosen based on a variety of factors including dividends, income, interest rates, company management, price to earnings ratios, and other factors. Specific mutual funds are chosen based on where its investment objective fits into the asset allocation recommended by PIN, its risk parameters, past performance, peer rankings, fees, expenses, and any other aspects of the fund PIN deems relevant to that particular fund. Specific third-party managers are chosen based on their performance, investment style, investment consistency, experience, and expertise. PIN bases its conclusions on publicly available research, such as regulatory filings, press releases, purchased research, and proprietary screens and analytics. We will also utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future.

Third Party Managers

We may recommend that certain portions of a client's portfolio be managed by independent third-party managers or recommend direct investment with independent third-party managers, typically when those managers demonstrate knowledge and expertise in a particular investment strategy. We do not

consider a mutual fund to be a separate account manager, as the mutual fund itself is a security.

We examine the experience, expertise, investment philosophies and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentration and leverage as part of our overall periodic assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

Based on a client's individual circumstances and needs, we will determine which selected money manager's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance and the investment philosophy of the selected money manager. We encourage clients to review each third-party manager's disclosure document regarding the particular characteristics of any program and managers selected by us.

We will regularly and continuously monitor the performance of the selected money managers. If we determine that a particular selected money manager is not providing sufficient management services to the client or are not managing the client's portfolio in a manner consistent with the client's investment objectives, we will remove the client's assets from that selected money manager and place the client's assets with another money manager at our discretion and without prior consent from the client, unless the client non-discretionary. Permission for non-discretionary accounts will be obtained before placing the client's assets with another money manager.

PIN will obtain appropriate due diligence on all independent third-party managers, making reasonable inquiries into their performance calculations, policies and procedures, code of ethics policies and other operational and compliance matters to account for performance and risk management. We examine the experience, expertise, investment philosophies and past performance of third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

The use of a third-party manager, not change the relationship between the PIN professional and the client, in that such professional will still manage the overall client portfolio, adding, subtracting and modifying the allocations to different strategies and managers.

Material Risks Involved

It is important for clients to know and remember that all investments carry risks. **Investing in securities involves risk and may result in a loss of clients' original investment which clients should be prepared to bear.**

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market

capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Political Risks: Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.

Third-party Manager Risk: A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risks Associated with Securities

Exchange Traded Funds: Prices may vary significantly from the Net Asset Value due to market condition. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the clients invest.

Mutual Funds: When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

ESG: When the investment process considers environmental, social and governance factors, the advisor may choose to avoid investments that might otherwise be considered or sell investments due to changes in ESG risk factors as part of the overall investment decision process. The use of environmental, social and governance factors may impact investment exposure to issuers, industries, sectors, and countries, which may impact a portfolio's relative performance.

Equity Securities: Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

Fixed Income: The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by the Fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

PIN and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of PIN or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

Advisors of PIN Wealth, LLC may also be registered representatives of Purshe Kaplan Sterling

Investments (“PKS”), a FINRA member broker-dealer. Because PKS supervises advisors’ activities as a registered representative of PKS, the relationship may be deemed material. However, PKS is not affiliated with PIN Wealth, LLC (hereinafter “PIN”) or considered a related party. PKS does not make investment decisions for client accounts. Advisors’ status as a registered representative enables them to receive customary commissions for the sales of various products, including variable annuity products. They may receive such a commission on the sale of a product he recommends to clients.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with PIN. PIN attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

B. Futures Commission Merchant/Commodity Trading Advisor

None the principals of PIN, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

PIN Wealth, LLC has contracted with OneAscent Investment Solutions, LLC (OAIS) to provide a Unified Managed Account or “UMA,” which is a single portfolio with a mix of asset classes and investment positions through the use of model portfolios, which may consist of third-party managers, and to a lesser extent, other investment options such as mutual funds and exchange traded funds. This is accomplished with the use of an Overlay Manager. The Overlay Manager that OneAscent has selected is Adhesion Wealth Advisors Solutions (“Adhesion”), which provides portfolio trading, re-balancing, reporting and other administrative services. Each UMA is designed to meet a specific goal, while maintaining diversification to mitigate short term risk, and at the same time positioned to appreciate and create income for the investor. UMAs are created by OAIS and accessed by other advisors for their clients.

The owners of OAIS, are also indirect owners of OneAscent Financial Services LLC. OneAscent Financial Services LLC (“OAFS”) provides investment advice to clients, but does not perform investment advisory services for PIN Wealth, LLC. It does, however, provide back-office services to OneAscent. “Back office” services include compliance, trading and trade reconciliation, billing, marketing, technology and business continuity. In addition, the errors and omissions insurance for OneAscent is purchased through OneAscent Financial Services LLC. OAFS is also set up as a Turnkey Asset Management Platform which will bill client accounts on behalf of PIN, and will also have the authority to affect trades.

Certain professionals of PIN are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for PIN clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of PIN. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received.

D. Recommendations of Other Advisers

PIN may at times recommend unrelated, third-party investment managers or professionals who have a greater expertise in certain disciplines when appropriate for the client. We do not receive any compensation from the unrelated, third-party investment managers or professionals, nor do we charge any additional fee to our clients for the recommendation to selection of third-party investment managers or professionals.

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

A. A copy of the Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts and entertainment.

B. PIN does not recommend to clients that they invest in any security in which PIN or any principal thereof has any financial interest.

C. Firm principals may at some point recommend, and choose to invest in a security in their personal account that is already in, or being considered for, a client account. Principals will not place personal trades before client trades in the same security.

D. Firm Principals may at some point choose to invest in a security in their personal account at the same time that security is being traded for or being considered for, a client account. Principals will not place personal trades before client trades in the same security at the same time.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Specific custodian recommendations are made to the client based on their need for such services. PIN recommends custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

PIN does not receive soft dollar benefits.

2. Brokerage for Client Referrals

PIN receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

PIN recommends a specific custodian for clients to use.

The Custodian and Broker Used (Fidelity)

The custodian and broker PIN uses maintains custody of client assets that PIN manages, although PIN may be deemed to have limited custody of your assets due to the ability to withdraw fees from client accounts (see Item 15 – Custody, below). PIN recommends that clients use Fidelity, a registered broker-dealer, member SIPC, as the qualified custodian. PIN is independently owned and operated and is not affiliated with Fidelity.

Item 13: Review of Accounts

All client profiles will be managed on an ongoing basis, with formal reviews with the client on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger a review of accounts.

The quarterly performance report in writing provided by PIN is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from their custodians.

Item 14: Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

This item is not applicable, as PIN is not provided any economic benefit by third parties for providing services to clients.

B. Compensation to Non-Advisory Personnel for Client Referrals.

PIN does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

There are two avenues through which PIN has custody of client funds; by directly debiting its fees from client accounts pursuant to applicable agreements granting such right, and potentially by permitting clients to issue standing letters of authorization ("SLOAs"). SLOAs permit a client to issue one document that directs PIN to make distributions out of the client's account(s).

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by PIN against the information in the statements provided directly from their account custodian. Please alert us of any discrepancies.

In addition to the account custodian's custody procedures, PIN will confirm that, for clients issuing SLOAs, the accounts to which funds are distributed are parties unrelated to PIN.

Item 16: Investment Discretion

For those Client accounts where PIN provides Investment Management Services, PIN maintains discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

In limited circumstances, clients may engage PIN on a non-discretionary basis. While there will be an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, PIN will seek specific approval of changes to client accounts before any changes are made. Clients can always make deposits or withdrawals in their accounts at any time. Clients will be responsible for executing an Investment Management Agreement that outlines the responsibilities of both the client and PIN.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. PIN will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Upon a client's request, PIN will give clients advice on how to vote proxies, but it is the responsibility of the client and the outside managers to vote client securities.

Item 18: Financial Information

PIN does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.