

Item 1: Cover Page

Asset Strategies, Inc. **Form ADV Part 2A** **Investment Adviser Brochure**

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March 2023

This Brochure provides information about the qualifications and business practices of Asset Strategies, Inc. (“we,” “us,” “our”). If you have any questions about the contents of this Brochure, please contact Diann E. McChesney, CFP, Executive Vice President and Chief Compliance Officer, at (860) 673-5500 or at diann@assetstrats.com.

Additional information about our Firm is also available on the SEC’s website at www.adviserinfo.sec.gov. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

We are a registered investment adviser. Please note that use of the term “registered investment advisor” and a description of the Firm and/or our employees as “registered” does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Material Changes

Annual Update

In this Item of Asset Strategies, Inc.'s (ASI or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment.

Material Changes since the Last Update

Since our last Annual Amendment filing on March 22, 2022, the Firm has the following Material Changes to report:

- This Form was updated to include information regarding our fiduciary role when providing services to retirement investors and retirement accounts. Please see Item 4: Advisory Business for more information.
- This Form was updated to include disclosure of our conflict of interest related to the financial incentive we have in recommending the transfer of retirement plan assets to accounts that we manage. Please see Item 5: Fees and Compensation for more information.
- This Form was updated to remove the ability to charge clients on an hourly basis. Please see item 5: Fees and Compensation for more information.

Full Brochure Available

Our Form ADV may be requested at any time, without charge by contacting Diann E. McChesney, CFP, Executive Vice President and Chief Compliance Officer, at (860) 673-5500 or diann@assetstrats.com.

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Item 4: Advisory Business

Asset Strategies, Inc. (ASI or the Firm) is a fee-only investment management and financial planning firm founded in 2002. ASI is owned by Alan M. Rothstein, CPA, PFS (President) and Diann E. McChesney, CFP® (Executive Vice President and Chief Compliance Officer).

Asset Management Services

ASI provides asset management services customized to the individual needs of each client. Through personal discussions, ASI assists the client in developing goals and objectives. ASI then develops a client's personal investment policy, creates a portfolio based on that policy and gives continuous investment advice to the client. Asset management is guided by the stated objectives of the client (e.g., growth, income, capital preservation.)

At the inception of an account any individual securities held by the client will be considered in the asset allocation for the client; however, ASI does not charge a fee on those assets and will only act on a non-discretionary basis to buy or sell those securities.

ASI manages a portfolio consisting of one or all of the following:

- Cash and cash equivalents, including money market funds and short-term bank certificates of deposit
- Fixed income (bond mutual funds, exchange traded funds, individual bonds, and/or certificates of deposits) which may include U.S. government and agency, municipal, international, inflation protected and corporate bonds
- U.S. large and mid/small growth and value equities (stock mutual funds, exchange traded funds and/or individual stocks)
- International large and mid/small growth and value equities and emerging markets equities (stock mutual funds, exchange traded funds and/or individual stocks)
- Real Assets (REITs, REIT and/or Real Asset mutual funds or exchange traded funds)
- Alternate strategy mutual funds (for example, long-short funds)

ASI allocates the client's assets among selected investments in accordance with the client's Investment Policy Statement (IPS). Portfolio weighting among asset classes and investments is determined by each client's individual needs and circumstances.

ASI develops a customized IPS for each client. We design and manage each client's portfolio based on the IPS. The IPS includes a target asset allocation, and it is reviewed with and signed by the client.

ASI also considers the tax impact of investment decisions in designing and managing client portfolios. Investment tax strategies can include:

- Tax deferral and or acceleration of income

- Placing investments into taxable v. tax-deferred accounts based on the income tax treatment of the securities and the income that these securities pay
- Harvesting capital gains and losses
- Planning for mutual fund distributions in taxable accounts.

ASI rebalances portfolios back to target asset allocations when appropriate. Cash flow and income tax considerations are factors in determining rebalancing activity.

Financial Planning

Personal financial planning includes informal consultations, segmented plans, and comprehensive plans. The planning process involves interviews with the client, a review of pertinent documents and a plan based on the client's goals and objectives.

A comprehensive plan consists of the following where applicable:

- Clarifying and prioritizing goals
- Cash management
- Retirement planning
- Education planning
- Risk management
- Income tax planning
- Estate tax planning
- Investment planning
- Periodic updates

ASI gathers information from new clients through personal interviews and, in some cases, the client completes a questionnaire. Information gathered includes a client's future goals, current financial situation, and attitudes towards risk. All information supplied by the client, including any supplemental documents, is reviewed, and analyzed.

Financial planning will often involve a team approach including professional advisors such as insurance agents, attorneys, and CPAs. The client has complete discretion to implement some or all of the plan's recommendations.

Sub-Advisors

In certain circumstances, ASI may recommend other investment advisors (Sub-Advisor) to manage a portion of a client's portfolio, primarily fixed income securities. The Sub-Advisor will charge the client for the portion of the portfolio they are managing; this fee may be in addition to the management fee charged by ASI. ASI does not receive any compensation for sub-advised portfolios.

Tailored Relationships

ASI tailors investment advisory services to the individual needs of the client. ASI clients are allowed to impose restrictions on the investments in their account. Clients have the opportunity to place reasonable restrictions on the types of investments which are made on the client's behalf. Clients retain individual ownership of all securities.

Fiduciary Statement

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act, ("ERISA") and/or the Internal Revenue Code, ("IRC"), as applicable, which are laws governing retirement accounts.

We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must take into consideration each client's objectives and act in the best interests of the client. We are prohibited from engaging in any activity that is in conflict with the interests of the client. We have the following responsibilities when working with a client:

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

Regulations prohibit us from:

- Employing any device, scheme, or artifice to defraud a client;
- Making any untrue statement of a material fact to a client or omitting to state a material fact when communicating with a client;
- Engaging in any act, practice, or course of business which operates or would operate as fraud or deceit upon a client; or
- Engaging in any manipulative act or practice with a client.

We will act with competence, dignity, integrity, and in an ethical manner, when working with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

Wrap Fee Programs

ASI does not participate in a Wrap Fee Program.

Client Assets

ASI manages \$140,582,461 as of January 26, 2023 of which \$137,194,905 are managed on a discretionary basis, and \$3,387,556 are managed on a non-discretionary basis.

Item 5: Fees and Compensation

ASI services are provided on a fee only basis. ASI does not sell financial products or accept commissions or any other compensation from outside sources.

Fees for Asset Management Services:

Fees for asset management services will be charged based on a percentage of assets under management, according to the following schedule:

Assets Under Management	Annual Fee
First \$500,000	1.10%
Next \$500,000	1.00%
Next \$1,000,000 to \$5,000,000	0.90%
Over \$5,000,000	0.70%

Fees are negotiable under certain circumstances.

ASI will provide a specific fee schedule to each client. Fees for individual accounts for members of the same family (defined as spouses/partners and dependent children and trusts for the benefit of such family members), are based on the total account balance of all family accounts.

Fees are computed and billed quarterly, in advance, and are based upon the fair market value (including cash), of the client's account on the last day of the preceding calendar quarter.

Investment advisory agreements are effective for one year beginning the date the contract is signed and shall be automatically renewed for successive one-year terms. A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

Fees for Financial Planning Services:

ASI estimates and quotes financial planning fees prior to clients engaging our services. In determining fees ASI considers:

- Time and effort involved
- Complexity of the issues involved
- Involvement of other professional advisors
- Extra costs such as organizing client data and travel
- Time constraints imposed by the client's situation.

Fifty percent (50%) of the quoted financial planning fee will be due upon signing a contract with our firm. Fees typically start at \$1,750 but may be more depending upon the complexity of the plan. The balance of the fee will normally be billed as work is completed. ASI will never hold client funds greater than \$1,200 for more than six months in advance.

Provided that all information needed to prepare the financial plan has been promptly provided by the client, a financial plan will usually be presented to the client within 90 days of the contract date.

In certain limited circumstances, a client may pay for personal financial planning services in the amount of \$375 per quarter billed in advance.

Sub-Advisors

As described in Item 4, ASI does not receive compensation for sub-advised portfolios. If ASI engages a sub-advisor on the client's behalf, any advisory fees for the services of the sub-advisor will be separate from ASI's fees. For example, ASI may engage a manager to run a client's municipal bond investments, and that manager's fees will be in addition to ASI's fees.

Cash Balances

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

Retirement Plan Rollover Recommendations

As part of our investment advisory services to our clients, we may recommend that clients roll assets from their employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will advise on the client's behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts.

If the client elects to roll the assets to an IRA that is subject to our advisement, we will charge the client an asset-based fee as set forth in the advisory agreement the client executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to the client (i.e., receipt of additional fee-based compensation). Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, clients are under no obligation to have the assets in an IRA advised on by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in our clients' best interests and not put our interests ahead of our clients.'

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of our clients' when making recommendations (give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in our clients' best interests;
- charge no more than a reasonable fee for our services; and
- give clients basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

1. leaving the funds in the employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide clients with a written explanation of the advantages and disadvantages of both account types and document the basis for our belief that the rollover transaction we recommend is in your best interests.

General Information on Fees and Compensation

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low-cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

ASI's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. For example, some mutual fund transactions may produce a transaction charge which will be deducted from the client's account. Similarly, trades through broker-dealers may create other transaction charges which will also be deducted from the client's account. Some custodians may charge custodial fees which will be deducted from the client's account.

Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to ASI's fee, and ASI shall not receive any portion of these commissions, fees, and charges.

Item 6: Performance-Based Fees and Side-By-Side Management

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

Item 7: Types of Clients

ASI provides portfolio management services to individuals, high net worth individuals, and trusts.

There is no minimum account size required for this service. As previously noted, fees are negotiable under certain circumstances.

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

Methods of Analysis and Investment Strategies

ASI's advice is based on long-term investment strategies which incorporate the principles of modern portfolio theory. Our approach is anchored in the belief that investors' returns are determined primarily by asset allocation decisions. Academic research suggests that the decision on how a portfolio is allocated among different asset classes will have far greater impact on portfolio performance than security selection and market timing.

ASI manages portfolios consisting of individual equities, bonds, no load and/or load-waived mutual funds, exchange traded funds and other investment products. ASI's overall securities analysis is based on a variety of sources:

- Commercially available software programs
- Security rating services
- Meetings with managers and representatives of mutual funds and separately managed accounts in which we invest
- General market and financial information provided by financial newspapers, periodicals, and issuer-provided information
- Outside consultants to provide expertise as needed.

Mutual funds are selected based on the following criteria, among other factors:

- Fund's investment objectives
- Fund's management style and philosophy
- Performance history
- Track record of the fund's manager
- Fees incurred by investors.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risk of loss:

- **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 next year will not buy as much as a dollar today, 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 (i.e., Non-traded REITs and other alternative investments) 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.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

Performance results cannot be guaranteed, and historical performance may not be indicative of future performance.

Item 9: Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of ASI or the integrity of ASI's management. ASI has no such information to disclose.

Item 10: Other Financial Industry Activities and Affiliations

ASI is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither ASI nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Alan M. Rothstein, President, is a certified public accountant and provides accounting and tax preparation services through his accounting firm, Rothstein & Company, LLC.

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Alan M. Rothstein, President, is a shareholder of National Advisor Holdings, Inc. ("NAH"), a Delaware corporation organized in August of 1999. Our principals hold less than 1.0% interest, in the aggregate, of the outstanding stock of NAH. NAH has formed a federal trust company known as National Advisors Trust Company ("NATC"). NATC provides trust services to clients of investment advisory firms, such as ASI, across the United States.

Because principals of ASI have an interest in NAH, and therefore indirectly have an interest in NATC, fees earned by NATC will accrue to the benefit of such principals and thus create a conflict of interest. Clients of ASI, however, are under no obligation to utilize the trust services provided by NATC.

ASI may select sub-advisors for its clients. ASI does not receive any compensation for the selection of sub-advisors.

Item 11: Code of Ethics

ASI has adopted a Code of Ethics (Code) that sets forth the high ethical standards that ASI requires of its employees, including compliance with applicable federal securities laws. As a fiduciary, ASI has a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us with their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity in all of our dealings.

The Code's key provisions include:

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

Employees are also expected not to divulge information regarding ASI's securities recommendations or client securities holdings to any individual outside of the firm except as required in the normal conduct of business (for example, communications with brokers and custodians).

Employees must acknowledge the terms of the Code at least annually. Any individual not in compliance with ASI's Code may be subject to termination.

Clients and prospective clients can obtain a copy of ASI's Code by contacting Diann E. McChesney, Executive Vice President and Chief Compliance Officer at (860) 673-5500.

Participation or Interest in Client Transactions – Personal Securities Transactions

ASI and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code, described above, is designed to assure that the personal securities transactions, activities, and interests of the employees of ASI will not interfere with (i) making decisions in the best interest of clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of ASI's clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code and designed to reasonably prevent conflicts of interest between ASI and its clients.

Participation or Interest in Client Transactions—Financial Interest and Principal/Agency Cross

Neither ASI nor its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest. It is ASI's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. ASI will also not cross trades between client accounts.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

ASI does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions.

Brokerage for Client Referrals

ASI does not receive client referrals from broker/dealers.

Directed Brokerage

ASI participates in the Schwab Institutional Services program offered to independent investment advisors by Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC.

While there is no direct linkage between the investment advice given and participation in these programs, economic benefits are received which would not be received if ASI did not give investment advice to clients. Many of these services generally may be used to service all or a substantial number of ASI's accounts. These economic benefits include: receipt of duplicate client confirmations and bundled duplicate statements electronically; access to a trading desk serving participants exclusively; access to block trading which provides the ability to aggregate fixed income securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client accounts; access, for a fee, to an electronic communication network for client order entry and account information; receipt of compliance information; and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors. ASI may also receive other services intended to help manage and further develop ASI's business enterprise. These services may include consulting, publications and presentations on practice management, information technology, regulatory compliance, and marketing. The benefits received through participation in these programs may or may not depend upon the amount of transactions directed to, or amount of assets custodied by Schwab.

ASI recommends the brokerage and custodial services of Schwab. ASI reserves the right to decline acceptance of any client account that directs the use of a broker-dealer other than Schwab if ASI believes that the broker-dealer would adversely affect ASI's fiduciary duty to the client and/or ability to effectively service the client's portfolio.

Trade Aggregation

ASI may block trades occasionally when advantageous to clients. Blocking trades permits trading of aggregate blocks of securities composed of assets from multiple clients' accounts so long as transactions costs are shared equally and on a prorated basis between all accounts included in such block. Block trading may allow ASI to execute trades in a timelier and more equitable manner and to reduce overall commission charges to clients. ASI will not be able to

block trades for clients who direct the use of a broker other than Schwab, and therefore a disparity in commission charges may exist between the commissions charged to other clients.

Item 13: Review of Accounts

The accounts within Asset Management Services are continuously monitored by Diann E. McChesney, Executive Vice President and Chief Compliance Officer, and Alan M. Rothstein, President. Additional reviews may be performed when portfolios are rebalanced, when new funds are added to the portfolios, when unexpected withdrawals are requested, and when portfolios are reviewed for tax efficiency opportunities. Accounts are reviewed in the context of each client's stated investment objectives and guidelines as well as changes in the client's individual circumstances.

In addition to the monthly statements and confirmations of transactions that investment management clients receive from their broker-dealer, ASI will provide quarterly status reports detailing portfolio positions and the performance.

Financial Planning – Reviews and Reporting

Financial planning reviews and updates are not charged to clients who maintain an asset under management relationship with ASI.

For those clients who choose financial planning services only, reviews and reports are available for a separate fee.

Item 14: Client Referrals and Other Compensation

ASI does not receive any economic benefits (other than as described in Item 12) from any firm or individual for providing investment advice.

Compensation – Client Referrals

ASI does not pay or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Custody – Fee Debiting

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

In addition, in certain circumstances where ASI has broad authority to access client assets held at an independent custodian, ASI is deemed to have custody. ASI complies with the SEC's Custody Rule, which requires an annual surprise examination conducted by an independent accountant.

Clients receive quarterly or more frequent statements from the broker-dealer, bank or other qualified custodian which holds and maintains client's investment assets. ASI urges clients to carefully review such statements and compare such official custodial records to the account statements that ASI may provide. ASI statements may vary from custodial statements based on accounting procedures, reporting dates, and/or valuation methodologies of certain securities.

Custody – First Party Money Transfers

Clients may provide us with written ongoing authorization to ACH money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e., a client's bank account). A copy of this authorization is provided to the qualified custodian. The authorization includes the client's account number(s) at the outside financial institution(s) as required.

Custody – Third Party Money Transfers

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

- The client provides a Written Authorization to the custodian that includes all appropriate information as to how the transfer should be directed;
- The Written Authorization includes instruction to direct transfers to the third party either on a specified schedule or from time to time;
- Appropriate verification is performed by the custodian, along with a transfer of funds notice to the client promptly after each transfer;
- The client may terminate or change the instruction to the custodian;
- We have no authority or ability to designate or change any information about the third party contained in the instruction;

- We maintain records showing that the third party is not a related party of the Firm or located at the same address as the Firm; and
- The custodian sends the client a written initial notice confirming the instruction and an annual written confirmation thereafter.

Item 16: Investment Discretion

ASI receives discretionary authority from the client at the outset of an advisory relationship. ASI is authorized to execute purchases and sales of investments on the client's behalf at ASI's own discretion without consulting the client regarding each purchase or sale. In all cases, such discretion is exercised in a manner consistent with the stated investment objectives for the client's portfolio.

When selecting securities and determining amounts to be invested, ASI observes the investment policies, limitations and restrictions outlined by the client in the written Investment Policy Statement.

If ASI has not been given discretionary authority, ASI consults with the client prior to each trade.

Item 17: Voting Client Securities

As a matter of Firm policy and practice, ASI does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

Clients may contact Diann E. McChesney, Executive Vice President and Chief Compliance Officer, at (860) 673-5500 with questions about the Firm's proxy voting policies.

Item 18: Financial Information

As a registered investment adviser, ASI is required to provide clients with certain financial information or disclosures about our financial condition.

ASI does not require prepayment of fees of both more than \$1,200 per client, and more than six months in advance; and therefore, is not required to provide a balance sheet to clients.

ASI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients. ASI has not been the subject of a bankruptcy proceeding.