

Form ADV Part 2A: *Firm Brochure*

Item 1 – Cover Page

Access Softek Advisory Services, LLC

727 Allston Way, Suite C
Berkeley, California 94710
510-848-0606

<http://accesssoftek.com/easyvest>

Date of Disclosure Brochure: August 21, 2023

This disclosure brochure (“Disclosure Brochure” or “Brochure”) provides information about the qualifications and business practices of Access Softek Advisory Services, LLC (also referred to as “we”, “us” and “Access Softek Advisory Services” throughout this Disclosure Brochure). If you have any questions about the contents of this Disclosure Brochure, please contact us at 510-848-0606 or fvisconti@accesssoftek.com. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Access Softek Advisory Services is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm’s information on this website by searching for Access Softek Advisory Services, LLC or our firm’s CRD number **299800**.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

The following is a summary of material changes made to this Disclosure Brochure since the last update filed on January 1, 2023:

- This Disclosure Brochure has been revised to reflect a material update to Access Softek Advisory Services' non-discretionary investment advisory business.
- Item 4 has been revised to reflect Access Softek Advisory Services' discretionary assets under management and non-discretionary assets under management.
- Item 5 has been revised to reflect the fees applicable to Securities Accounts and Digital Assets Accounts (each as defined below) and conflict of interest disclosures with respect to Access Softek Advisory Services' receipt of transaction-based fees.
- Item 8 has been revised to include risk factors applicable to Digital Assets Accounts.

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

We will ensure that you receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current Disclosure Brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Description of Advisory Services	4
Client Assets Managed by Access Softek Advisory Services	6
Item 5 – Fees and Compensation	6
Item 6 – Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients	8
Minimum Investment Amounts Required and Other Conditions	8
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	9
Methods of Analysis	9
Investment Strategies	10
Risk of Loss	11
Item 9 – Disciplinary Information	17
Item 10 – Other Financial Industry Activities and Affiliations	17
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	18
Code of Ethics Summary	18
Affiliate and Employee Personal Securities Transactions Disclosure	18
Item 12 – Brokerage Practices	18
Directed Brokerage	20
Block Trading Policy	20
Item 13 – Review of Accounts	20
Account Reviews and Reviewers	20
Statements and Reports	21
Item 14 – Client Referrals and Other Compensation	21
Item 15 – Custody	22
Item 16 – Investment Discretion	23
Item 17 – Voting Client Securities	23
Item 18 – Financial Information	23
Customer Privacy Policy Notice	24

Item 4 – Advisory Business

Access Softek Advisory Services, LLC is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a limited liability company (LLC) formed under the laws of the State of California.

- Access Softek Advisory Services is 100% owned and controlled by Access Softek, Inc. which is privately owned by founder and CEO Chris Doner. Access Softek, Inc. formed Access Softek Advisory services to provide an online, digital investment adviser service option for credit union clients of Access Softek, Inc. See Item 10 of this Brochure for more information about Access Softek, Inc. See Item 14 of this Brochure for more information about our arrangements with third-party credit unions.
- Access Softek Advisory Services has been in business since June 2019 when it filed its initial application for registration as an investment adviser.

Description of Advisory Services

Access Softek Advisory Services offers both discretionary and non-discretionary investment management services by providing you with continuous and ongoing supervision over your specified accounts. Our services are provided through an interactive website using computer-based models and applications to collect your information and provide investment advice.

To determine your financial situation and investment objectives, we will need to obtain certain information from you through our interactive website. You will be responsible for providing any changes to your financial situation or investment objectives by updating your responses on our interactive website.

Discretionary Investment Advisory Services

Each individualized portfolio is designed to be consistent with your investment objectives and risk tolerances. We create an investment plan and manage your portfolio by seeking to identify: 1) the optimal asset classes in which to invest, 2) efficient investments to represent each of those asset classes, 3) the ideal mix of asset classes based on your specific risk tolerance, 4) the most appropriate time to rebalance your portfolio to maintain intended risk tolerance and optimal return for your risk level. Access Softek Advisory Services will tailor its allocation and investment management strategies based on your risk tolerance.

We primarily hold mutual funds and Exchange Traded Funds (ETFs) but may also hold equity and fixed income positions for a select number of clients in the investment account established and owned by the client (the “Securities Account”). Please see Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss for a description of the types of investments we provide advice on and strategies we use.

You must appoint our firm as your investment adviser of record for the Securities Account. The Securities Account consists only of separate account(s) held by qualified custodian(s) under your name by DriveWealth, LLC which serves as the qualified custodian and the broker/dealer. As qualified custodian, DriveWealth, LLC maintains physical custody of all funds and securities of the Securities Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Securities Account. Please see Item 12 – Brokerage Practices for more information regarding DriveWealth, LLC.

Non-Discretionary Investment Advisory Services

We initially only hold Bitcoin in the investment account established and owned by the client (the “Digital Assets Account”), but may in the future hold other Digital Assets. Access Softek Advisory Services shall manage the Digital Assets Account by issuing non-discretionary trading instructions to the client, which the client may then authorize in its sole discretion, and, in such case, the trading instructions will be sent to the custodian for execution. We generally warn each Digital Assets Account of any transaction which, after such transaction, would result in the value of the client's Digital Assets exceeding 10% of the aggregate of the Digital Assets Account and the client's accounts at the applicable credit union (the “10% Threshold”). Please see Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for a description of the types of investments we provide advice on and strategies we use.

You must appoint our firm as your investment adviser of record for the Digital Assets Account. The Digital Assets Account consists only of separate account(s) held by qualified custodian(s) under your name by BitGo New York Trust Company, LLC, a New York State registered trust company (“BitGo”), which serves as the qualified custodian, or other qualified custodian chosen by Access Softek Advisory Services. As qualified custodian, BitGo maintains physical custody of all funds and Digital Assets in the Digital Assets Account, and you retain all rights of ownership (e.g., right to withdraw Digital Assets or cash and receive transaction confirmations) of the Digital Assets Account. Please see Item 12 – Brokerage Practices for more information regarding BitGo.

Tailoring of Advisory Services and Client Imposed Restrictions

Access Softek Advisory Services' discretionary and non-discretionary investment advisory services are generally tailored to achieve the client's investment and financial objectives as described above. Clients may impose reasonable restrictions, through the interactive website, on Access Softek Advisory Services discretionary and non-discretionary investment advisory services.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security, Digital Asset, or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

Wrap Fee Programs

A wrap-fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management and/or advice concerning the selection of other investment advisers) and the execution of client transactions. We do not offer or participate in wrap-fee programs. All of our services are provided on a non-wrap fee basis which means fees and expenses for execution of client transactions charged by the client's broker/dealer-custodian, DriveWealth, LLC or BitGo, as applicable, and billed directly to the client's account separately from our advisory and transaction-based fees.

Conflict of Interest

Because transaction-based fees are being paid to Access Softek Advisory Services in connection with its advisory services to Digital Assets Accounts, Access Softek Advisory Services could have an economic incentive to maximize its compensation by seeking to maximize the number of trades in the clients' Digital Assets Accounts. However, as discussed above, Access Softek Advisory Services generally warns its clients not to exceed the 10% Threshold.

Client Assets Managed by Access Softek Advisory Services

Access Softek Advisory Services, LLC has a total of \$4,630,220 in discretionary assets under management and a total of \$0.00 in nondiscretionary assets under management, as of August 21, 2023.

Item 5 – Fees and Compensation

Advisory Fees

Annual fees charged for our web-based, discretionary and non-discretionary investment management services are generally charged based on a percentage of assets under management, divided and billed in advance (at the beginning of the billing period) on a monthly calendar basis and calculated based on the fair market value of your account as of the last day of the prior calendar month. Standard annual fees range between 0.30% and 0.80% of the total assets held in managed accounts, subject to a minimum fee of \$0.50 per month. For example, if your annual fee is 0.45% you will be assessed a monthly fee equal to 0.0375% multiplied by the fair market value of your account as of the last date of the prior calendar month.

Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period is based on the value of the account when services commence and is due immediately and will be deducted from your account when services commence.

We do not negotiate fees with clients. However, fee rates charged may vary among clients based on the client's credit union. This is because we allow credit unions discretion to determine the specific fee rates charged to their clients.

Access Softek Advisory Services believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs.

Transaction-Based Fees

With respect to Digital Assets Accounts only, a transaction-based fee is charged for each Digital Assets transaction. The transaction-based fee is typically 2% of the transaction amount. For example, the purchase or sale of \$100 worth of Bitcoin will result in a \$2 transaction-based fee paid to Access Softek Advisory Services.

How Fees are Collected

With respect to the Securities Accounts, investment advisory fees will be deducted from your account and paid directly to our firm by DriveWealth, LLC. You must designate Access Softek Advisory Services as your investment adviser on the accounts you'd like Access Softek Advisory Services to manage. Access

Softek Advisory Services will be granted limited power-of-attorney on the account to implement trades within the account and (when agreed to by the client) deduct the Access Softek Advisory Services advisory fees from the account. DriveWealth, LLC will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee deducted directly from the account.

With respect to Digital Assets Accounts, investment advisory fees and transaction-based fees will be deducted from your account and paid directly to our firm by BitGo. You must designate Access Softek Advisory Services as your investment adviser on the accounts you'd like Access Softek Advisory Services to manage. Access Softek Advisory Services will be granted limited power-of-attorney on the account to implement trades (upon the prior authorization of the client) within the account and (when agreed to by the client) deduct the Access Softek Advisory Services advisory fees and transaction-based fees from the account. BitGo will send client statements showing all disbursements for the account including the amount of the advisory fee deducted directly from the account.

You should review your account statements received from DriveWealth, LLC and/or BitGo, as applicable, and verify that appropriate investment advisory fees and transaction-based fees, as applicable, are being deducted. Neither DriveWealth, LLC nor BitGo will verify the accuracy of the investment advisory fees or transaction-based fees deducted. It is Access Softek Advisory Services' and client's responsibility to verify the accuracy of Access Softek Advisory Services' fee calculation.

Other Fees and Expenses

Brokerage expenses and/or transaction ticket fees charged by DriveWealth, LLC are billed directly to your account by DriveWealth, LLC. Access Softek Advisory Services does not receive any portion of such expenses or fees from you or DriveWealth, LLC. In addition, you may incur certain charges imposed by third parties other than Access Softek Advisory Services in connection with investments made through your account including, but not limited to surrender charges, internal mutual fund expenses, IRA and qualified retirement plan fees and charges imposed by DriveWealth, LLC. Management fees charged by Access Softek Advisory Services are separate and distinct from the fees and expenses charged by mutual funds that are held in your account. A description of these fees and expenses are available in each mutual fund prospectus. We do not receive any portion of such fees or expenses.

Expenses charged by BitGo are billed directly to your account by BitGo. Access Softek Advisory Services does not receive any portion of such expenses or fees from you or BitGo. In addition, you may incur certain charges imposed by third parties other than Access Softek Advisory Services in connection with investments made through your account and charges imposed by BitGo, including, but not limited to, miner or validator fees applicable to the applicable Digital Asset network, custodial fees, clearing fees, exchange fees, blockchain fees, or hardware and physical values for storage of private keys.

With respect to the Digital Assets Accounts, Access Softek Advisory Services may also use a variety of other Digital Assets providers including, but not limited to HeightZero, LLC ("HeightZero") for a Digital Asset turnkey asset management platform to service such accounts. HeightZero will assess a monthly service fee for each Digital Assets Account based on a percentage (typically 4.1667 basis points or 0.041667%) of the 24-hour volume weighted average price of each Digital Asset held within such account. Such fees will be deducted direct from the account, per the client's end user agreement with HeightZero.

Conflict of Interest

With respect to the Digital Assets Accounts, Access Softek Advisory Services' investment advisory services presents a conflict of interest as the receipt of the transaction-based fees may provide an incentive for Access Softek Advisory Services to recommend the trading of Digital Assets based on the fees to be received, rather than on the client's financial situation and investment objectives. No client is under any obligation to purchase any Digital Assets from BitGo or any other custodian chosen by Access Softek

Advisory Services. Pursuant to the client account agreement, Access Softek Advisory Services shall manage the Digital Assets Account by issuing non-discretionary trading instructions to the client, which the client may then authorize in its sole discretion and, in such case, the trading instructions will be sent to BitGo or any other custodian chosen by Access Softek Advisory Services for execution. Additionally, Access Softek Advisory Services may not, without prior client authorization, buy, invest in, hold for investment, own assign, transfer, sell, exchange, trade in, lend, pledge, deliver and otherwise deal in Digital Assets at the client's risk for the Digital Assets Account. Access Softek Advisory Services also generally warns its clients not to exceed the 10% Threshold. In addition to the terms discussed above, Access Softek Advisory Services seeks to mitigate this conflict through disclosure in this Brochure.

Clients may purchase Digital Assets recommended by Access Softek Advisory Services through other, non-affiliated custodians and exchanges.

Access Softek Advisory Services does not receive more than 50% of its revenue from clients as a result of commissions, transaction-based fees, or other compensation for sale of investment products (including Digital Assets) that Access Softek Advisory Services recommends to its clients.

The receipt of transaction-based fees by Access Softek Advisory Services does not offset or otherwise reduce the advisory fee charged by Access Softek Advisory Services in connection with its investment advisory services to the Digital Assets Accounts.

Termination

Investment management services continue until terminated by either party (i.e., Access Softek Advisory Services or you or your credit union) (See Item 14 for details regarding our arrangements with unaffiliated credit unions). Access Softek Advisory Services will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

There will be no termination fee; however, client accounts may be subject to a modest cost of reimbursement of fees related to transferring client's account. Such fees would be charged by the client's account custodian and Access Softek Advisory Services will not receive any portion of such fee.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Access Softek Advisory Services provides web based, discretionary and non-discretionary investment management services to natural person, individual clients and their family accounts.

You are required to execute a written agreement with Access Softek Advisory Services specifying the particular advisory services in order to establish a client arrangement with Access Softek Advisory Services.

Minimum Investment Amounts Required and Other Conditions

With respect to the Securities Accounts and Digital Assets Accounts, Access Softek Advisory Services requires a minimum of \$200.00 in order to open such account and to keep such account open.

Investors evaluating Access Softek Advisory Services' web-based investment management service should be aware that Access Softek Advisory Services' relationship with clients is likely to be different from the "traditional" investment advisor relationship in several aspects:

1. Access Softek Advisory Services is a software-based investment advisor which means each client must acknowledge her ability and willingness to conduct her relationship with Access Softek Advisory Services on an electronic basis. Under the terms of our agreement, each client agrees to receive all account information and account documents (including this Brochure), and any updates or changes to same, through their access to our website and Access Softek Advisory Services' electronic communications. Unless noted otherwise on the website or within this Brochure, Access Softek Advisory Services' advisory service, the signature for our client agreement, and all documentation related to the advisory services are managed electronically. Access Softek Advisory Services does make individual representatives available to discuss servicing matters with clients.

2. To provide its discretionary and non-discretionary investment advisory services, as applicable, and tailor its investment decisions to each client's specific needs, Access Softek Advisory Services collects information from each client, including specific information about their investing profile such as financial situation, investment experience, and investment objectives. Access Softek Advisory Services maintains this information in strict confidence subject to our Privacy Policy. When customizing our investment solutions, Access Softek Advisory Services relies upon the information received from a client. Although Access Softek Advisory Services contacts its clients periodically as described further in Item 13 below, a client must promptly notify Access Softek Advisory Services of any change in her financial situation or investment objectives that might require a review or revision of her portfolio.

3. With respect to Access Softek Advisory Services' management of the Securities Accounts, the software based financial advisor service includes preselected ETFs and mutual funds for each asset class within the plan recommended to a client. Access Softek Advisory Services does not allow clients to select their own investments because each mutual fund and asset class is considered to be part of the overall investment plan. Investors with overly restrictive investment restrictions may not be permitted to become clients.

4. With respect to Access Softek Advisory Services' management of the Digital Assets Accounts, Access Softek Advisory Services may not, without prior client authorization, invest in, hold for investment, own, assign, transfer, sell, exchange, trade in, lend, pledge, deliver and otherwise deal in Digital Assets at the client's risk for such account. The client is free at all times to accept or reject any investment recommendations from Access Softek Advisory Services. Additionally, Access Softek Advisory Services generally warns its clients not to exceed the 10% Threshold

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

Securities Accounts

Methods of Analysis

Access Softek Advisory Services uses the following methods of analysis in formulating investment advice:

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current

price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Investment Strategies

Access Softek Advisory Services primarily implements investment strategies focusing on long-term purchases (investments held for at least one year) but depending on circumstances in the overall investment market we will implement short-term purchases (investments sold within one year). More specifically, the firm uses the following investment strategies when managing client investment accounts.

- **Value Investing.** We follow a value-investing strategy that attempts to acquire at reasonable valuations publicly traded businesses that can deliver sustainable excess returns. Value Investing can be described as a strategy of selecting investments that trade for less than their intrinsic values. Value investors typically seek shares of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e., businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.
- **Strategic Asset Allocation.** This type of strategy calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

The risk associated with any type of long-term investing is that we do not actively change our positions when there are short-term periods of fluctuation and volatility. This is because we strive to select investments based on anticipated results for longer periods rather than short-term swings in the market. Because we do not implement an "active" trading strategy and do not manage accounts for short-term benefits, our managed accounts may not take advantage of short-term price fluctuations compared to a market-timer or short-swing investor.

Primarily Recommend Mutual Funds and Exchange Traded Fund (ETFs)

We primarily hold mutual funds and ETFs in client portfolios. When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual

fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will have the choice of commission free ETFs, as well as other ETF and mutual fund portfolios which may have transactions fees charged by our custodian, but not passed through to our firm.

Client choices will revolve around no load, no transaction fee ETFs, as well as no load, with transaction fee mutual funds, and transaction fee ETFs, ranging from more conservative allocations to more aggressive allocations, based on client responses to predetermined, qualifying questions.

We do not use leveraged or inverse ETFs.

Different mutual fund categories have different risk characteristics and investors should not compare different categories. For example, a bond fund and a stock fund that both have below average risk still have different risk/return potential (stock funds traditionally have higher risk/return potential). Risks are based on the investments held in the fund. For example, a bond fund faces interest rate risk and income risk and income is affected by the change in interest rates. A sector fund (investing in a single industry) is at risk that its price will decline due to industry developments. The following are some risks to consider when investing in mutual funds:

- Call Risk: A bond issuer may redeem high-yield bonds before maturity date due to falling interest rates.
- Default Risk: A bond issuer may fail to repay interest and principal.
- Income Risk: Dividends in a fixed income fund may decline due to falling interest rates.
- Geology Risk: Political events, natural disasters or financial problems may weaken a country or state's economy and cause investments to decline.
- Industry Risk: Stocks in a single industry may decline due to developments in that industry.
- Inflation Risk: Increases in the cost of living can reduce or eliminate a fund's actual returns when adjusted for inflation.
- Manager Risk: A manager may not execute the fund's investment strategy in a timely or effective manner.

Although we primarily use mutual funds and ETFs, we can develop and implement portfolios that hold equity (i.e. stocks) and fixed income (i.e. bonds) positions.

Digital Assets Accounts

Method of Analysis & Investment Strategy

We initially only hold Bitcoin in Digital Assets Accounts, but may in the future hold other Digital Assets. We generally warn each Digital Assets Account of any transaction which, after such transaction, would result in the value of the client's Digital Assets exceeding the "10% Threshold".

"Digital Assets" as used herein shall mean Bitcoin, but also may include other digital currencies and digital assets, cryptocurrencies, decentralized application tokens and protocol tokens, cryptographic tokens, blockchain-based assets, securities tokens, non-securities tokens, distributed ledger-based assets, cryptoassets, digital coins, stablecoins, altcoins, and other cryptofinance or digital assets that currently exist or may exist in the future.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, bonds, and Digital Assets, etc.) involves risk of loss. Further, depending

on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below.

Risks – General and Equity Securities

Management Risk. Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Market Risk. Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.

Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.

Equity (Stock) Market Risk. Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

Risks - Other

Additionally, there are certain risks associated with utilizing automated investment tools like the one offered by Access Softek Advisory Services.

- Our investment tool is programmed to use certain economic assumptions that may not be updated in a timely manner or shifts in the market.
- The output of the automated investment tool depends upon the accuracy of the information inputted into the tool.
- There may be certain factors or variables which have not been included in the automated investment tool. To the extent some questions are over-generalized, ambiguous or designed to fit a pre-determined option, the output may not be right for all investor's needs or goals.
- By only using the automated investment service, investors could lose out on the value of human judgment and oversight. Investors may lose out on these qualities when interacting with only a computer program.

Risks – Digital Assets

Legality of Digital Assets. It may be illegal, now or in the future, to own, hold, sell or use Digital Assets in one or more countries, including the United States. Although currently Digital Assets are not regulated or are lightly regulated in most countries, including the United States, one or more countries may take regulatory actions in the future that severely restricts the right to acquire, own, hold, sell or use Digital Assets or to exchange Digital Assets for fiat currency. Such an action may restrict a clients' ability to hold or trade Digital Assets or may adversely affect a client's engagement with Access Softek Advisory Services.

Current and Future Digital Asset Regulation. Current and future legislation, Commodity Futures Trading Commission ("CFTC"), SEC, and Financial Crimes Enforcement Network (FinCEN) rulemaking and other regulatory developments may impact the manner in which Digital Assets are treated for classification and clearing purposes. As of the date of this filing, Access Softek Advisory Services is not aware of any rules that have been proposed to specifically regulate Digital Assets as commodities or securities. The SEC has issued multiple releases stating that, depending on the specific facts and circumstances of the Digital Asset in question, some Digital Assets may fall under securities regulation. Additionally, although the CFTC has declared that Digital Assets are commodities, currently, only certain kinds of Digital Assets, including Digital Asset transactions that are entered into, or offered, on a leveraged or margined basis, or financed by the offeror, may be subject to CFTC regulation. Access Softek Advisory Services cannot be certain as to how future regulatory developments will impact the treatment of Digital Assets under the law.

To the extent that Digital Assets are deemed to fall within the definition of a commodity future or further within the scope of CFTC regulation pursuant to subsequent rulemaking by the CFTC, Access Softek Advisory Services may be required to register and/or comply with additional regulation under the Commodity Exchange Act. Moreover, Access Softek Advisory Services may be subject to further requirements with the CFTC through the National Futures Association ("NFA"). Such additional registrations, regulations or disclosures may result in extraordinary, non-recurring expenses for clients. If Access Softek Advisory Services determines not to comply with such additional requirements, the clients, where necessary, may be liquidated at a time that may be disadvantageous.

To the extent that Digital Assets are deemed to fall within the definition of a security pursuant to subsequent rulemaking by the SEC, Access Softek Advisory Services may be required to register and comply with additional regulation. Such additional registrations may result in extraordinary, non-recurring expenses of the clients. If Access Softek Advisory Services determines not to comply with such additional regulatory and registration requirements, the clients, where necessary, may be liquidated at a time that may be disadvantageous.

Digital Assets currently face an uncertain regulatory landscape in not only the United States but also in many foreign jurisdictions such as the European Union, China, and Russia. Various foreign jurisdictions may, in the near future, adopt laws, regulations or directives that affect Digital Asset networks and their users, particularly Digital Asset exchanges and service providers that fall within such jurisdictions' regulatory scope. Such laws, regulations or directives may conflict with those of the United States and may negatively impact the acceptance of Digital Assets by users, merchants, and service providers outside of the United States and may therefore impede the growth of the Digital Asset economy.

The effect of any future regulatory change on clients is impossible to predict, but such change could be substantial and adverse.

Digital Assets. Digital Assets are loosely regulated and there is no central marketplace for currency exchange. Supply is determined by a computer code, not by a central bank, and prices can be extremely volatile. Digital Asset exchanges have been closed due to fraud, failure, or security breaches. Any client funds that reside on an exchange that shuts down may be lost.

Several factors may affect the price of Digital Assets, including, but not limited to: supply and demand, investors' expectations with respect to the rate of inflation, interest rates, currency exchange rates or future regulatory measures (if any) that restrict the trading of Digital Assets or the use of Digital Assets as a form of payment. There is no assurance that Digital Assets will maintain their long-term value in terms of purchasing power in the future, or that acceptance of Digital Asset payments by mainstream retail merchants and commercial businesses will grow.

Digital Assets are created, issued, transmitted, and stored according to protocols run by computers in the Digital Asset network. It is possible these protocols have undiscovered flaws which could result in the loss of some or all assets held by clients. There may also be network scale attacks against these protocols which result in the loss of some or all of assets held by clients. Some assets held by clients may be created, issued, or transmitted using experimental cryptography which could have underlying flaws. Advancements in quantum computing could break the cryptographic rules of protocols which support the assets held by clients. Access Softek Advisory Services makes no guarantees about the reliability of the cryptography used to create, issue, or transmit assets held by the clients.

Digital Asset Exchanges. The Digital Asset exchanges on which Digital Assets trade are relatively new and largely unregulated and may therefore be more exposed to theft, fraud and failure than established, regulated exchanges for other products. In general, Digital Asset exchanges are currently start-up businesses with no institutional backing, limited operating history and no publicly available financial information. Exchanges generally require cash to be deposited in advance in order to purchase Digital Assets, and no assurance can be given that those deposit funds can be recovered. Additionally, upon sale of Digital Assets, cash proceeds may not be received from the exchange for several business days. The participation in exchanges requires users to take on credit risk by transferring Digital Assets from a personal account to a third-party's account. Clients will take credit risk of an exchange every time they transact.

Digital Asset exchanges may impose daily, weekly, monthly, or customer-specific transaction or distribution limits or suspend withdrawals entirely, rendering the exchange of Digital Assets for fiat currency difficult or impossible. Additionally, Digital Asset prices and valuations on Digital Asset exchanges have been volatile and subject to influence by many factors including the levels of liquidity on exchanges and operational interruptions and disruptions. The prices and valuation of Digital Assets remain subject to any volatility experienced by Digital Asset exchanges, and any such volatility can adversely affect the operations of the Digital Assets Accounts.

Digital Asset exchanges are appealing targets for cybercrime, hackers, and malware. It is possible that while engaging in transactions with various Digital Asset exchanges located throughout the world, any such exchange may cease operations due to theft, fraud, security breach, liquidity issues, or government investigation. In addition, banks may refuse to process wire transfers to or from exchanges. Over the past several years, many exchanges have, indeed, closed due to fraud, theft (e.g., fx voluntarily shutting down because it was unable to account for over eight hundred and fifty thousand (850,000) Bitcoin), government or regulatory involvement, failure or security breaches (e.g., the voluntary temporary suspensions by Mt. Gox of cash withdrawals due to distributed denial of service attacks by malware and/or hackers), or banking issues (e.g., the loss of Tradehill's banking privileges at Internet Archive Federal Credit Union).

Any financial, security or operational difficulties experienced by such exchanges may result in an inability of clients to recover money or Digital Assets being held by the exchange. Further, clients may be unable to recover Digital Assets awaiting transmission into or out of client accounts, all of which could adversely affect an investment with Access Softek Advisory Services. Additionally, to the extent that the Digital Asset exchanges representing a substantial portion of the volume in Digital Asset trading are involved in fraud or experience security failures or other operational issues, such Digital Asset exchanges' failures may result in loss or less favorable prices of Digital Assets, or may adversely affect Clients, their operations and investments, or the Investors.

No FDIC or SIPC Protection. Digital Assets are not subject to Federal Deposit Insurance Corporation ("FDIC") or Securities Investor Protection Corporation ("SIPC") protections. Since Access Softek Advisory Services and BitGo, or any other custodian of Access Softek Advisory Services' choosing are not members of the FDIC or SIPC, client assets are not subject to the protections enjoyed by depositors with FDIC or SIPC member institutions. While private insurance may be available at times, client assets are not insured by Access Softek Advisory Services.

Qualified Custodians. Entities that provide custody for Digital Assets are subject to evolving guidelines from regulatory authorities. Although Access Softek Advisory Services takes the view that BitGo is a "qualified custodian" for purposes of Rule 206(4)-2 (the "Custody Rule") under the Investment Advisers Act of 1940, as amended (the "Investment Advisers Act"), there is a risk that the SEC or a state regulator would disagree.

Risk of Loss of Private Key. Digital Assets are controllable only by the possessor of unique private keys relating to the addresses in which the Digital Assets are held. The theft, loss or destruction of a private key required to access a Digital Asset is irreversible, and such private keys would not be capable of being restored by clients or BitGo. Any loss of private keys relating to digital wallets used to store a client's Digital Assets could result in the loss of the Digital Assets and an Investor could incur substantial, or even total, loss of capital.

Digital Assets Trading is Volatile and Speculative. Digital Assets represent a speculative investment and involve a high degree of risk. As relatively new products and technologies, Digital Assets have not been widely adopted as a means of payment for goods and services by major retail and commercial outlets. Conversely, a significant portion of the demand for Digital Assets is generated by speculators and investors seeking to profit from the short or long-term holding of Digital Assets. The relative lack of acceptance of Digital Assets in the retail and commercial marketplace limits the ability of end-users to pay for goods and services with Digital Assets. A lack of expansion by Digital Assets into retail and commercial markets, or a contraction of such use, may result in increased volatility.

Digital Assets Exchanges are Appealing Targets for Cybercrime, Hackers, and Malware. Even the largest exchanges have ceased operations due to theft, fraud, security breach, liquidity issues, or government investigation. In addition, banks may refuse to process wire transfers to or from exchanges. Over the past several years, many exchanges have, indeed, closed due to fraud, theft, government or regulatory involvement, failure or security breaches, or banking issues.

Any financial, security or operational difficulties experienced by such exchanges may result in BitGo's inability to recover money or Digital Assets being held by the exchange, or to pay clients upon withdrawal.

The daily trade volume of Digital Assets on any given exchange may only be a small fraction of total Digital Assets. The lack of a regulated market for Digital Assets and related assets means that market participants do not have as many mechanisms to hedge or create the liquidity in the Digital Asset market that is typical of traditional capital markets. The Digital Asset market also currently lacks many institutional participants, which could help to stabilize the market. For these reasons, among others, BitGo may be unable to purchase or sell a Digital Asset as desired for an extended period of time.

Amendments to a Digital Asset Network's Protocols and Software Could Adversely Affect Clients. Digital Asset networks (collectively, "Networks") are typically based on protocols that govern peer-to-peer interactions between computers connected to a Network. Generally, the code that sets forth a Digital Asset's protocol is informally managed by a development team known as the core developers. A Digital Asset's core developers, miners, and/or users (each such core group in respect of a particular Digital Asset, the "Community") can propose amendments to a Network's source code through one or more software upgrades that alter such Digital Asset's protocols, the software that govern its Network and the properties of the Digital Asset itself, including, but not limited to, the irreversibility of transactions and limitations on the mining/creation of new Digital Asset units. To the extent that a majority of a Community installs such software upgrade(s), such Digital Asset's Network could be subject to new protocols and software that may adversely affect Clients' investment operations. If less than a majority of a Community installs such software upgrade(s), such Digital Asset's Network could "fork."

Many Digital Assets are open source projects and, although there may be an influential group of leaders in a specific Community, there may be no official developers or group of developers that formally control the applicable Network. For many Digital Assets, any individual can download the applicable Network software and make any desired modifications, which are proposed to the relevant Digital Asset's Community through software downloads and upgrades. However, the Community must usually consent to those software modifications by downloading the altered software or upgrade that implements the changes; otherwise, the changes do not become a part of that Network. A developer or group of developers could potentially propose a modification to a Network that is not accepted by the applicable Community, but that is nonetheless accepted by a substantial portion of such Community. In such a case, a "fork" in the blockchain could develop and two separate Networks could result, one running the pre-modification software program and the other running the modified version (i.e., a second such Network in respect of the same Digital Asset). Such a fork in the blockchain typically would be addressed by Community-led efforts to merge the forked blockchains. This kind of split in a Network could materially and adversely affect the value of Clients'

investments or the Digital Assets owned by Clients and, in the worst-case scenario, harm the sustainability of the applicable Digital Asset's economy.

Risk to Digital Asset Networks from Malicious Actors. If a malicious actor or botnet (a volunteer or hacked collection of computers controlled by networked software coordinating the actions of the computers) obtains a majority of the processing power dedicated to mining on certain Digital Asset networks, it may be able to alter the blockchain on which the Digital Asset transaction relies on by constructing alternate blocks if it is able to solve for such blocks faster than the remainder of the miners on the Digital Asset network can add valid blocks. In such alternate blocks, the malicious actor or botnet could control, exclude, or modify the ordering of transactions, though it could not generate new Digital Assets or transactions using such control. Using alternate blocks, the malicious actor could double spend its own Digital Assets and prevent the confirmation of other users' transactions for so long as it maintains control. To the extent that such malicious actor or botnet does not yield its majority control of the processing power on various Digital Asset networks or the Digital Asset community does not reject the fraudulent blocks as malicious, reversing any changes made to the blockchain may not be possible. Such changes could adversely affect the client's Digital Assets Accounts or ability to transact.

Forks and Airdrops. The blockchain code for a Digital Asset may be split, resulting in two different Digital Assets: one that is unaltered and a second, new Digital Asset whose code is based on but differs from the original Digital Asset's code (a "Hard Fork"). Further, new Digital Assets may be distributed via "airdrops" to holders of certain existing Digital Assets (an "Airdrop"). New Digital Assets provided via a Hard Fork or Airdrop are provided involuntarily and without consideration. A Hard Fork or Airdrop may affect the value of the original Digital Asset. Generally, the custodian (i.e., BitGo), in its sole discretion, will elect whether or not to support or claim the new Digital Asset created as a result of a Hard Fork or Airdrop for the client's Digital Assets Account, depending on whether such new Digital Asset can feasibly be held in the client's Digital Assets Account as well as various other factors (e.g., security, cost, etc.), as determined by the custodian pursuant to its Hard Fork/Airdrop policy. BitGo's Hard Fork/Airdrop policy may change at any time, with or without notice to client or Access Softek Advisory Services. Various exchanges, Digital Asset custodians, wallets, or other storage solutions may not accommodate such Hard Forks or Airdrops or may only accommodate such Hard Forks or Airdrops after a significant period of time. Additionally, the Custodian or applicable custody solution may not have any systems in place to monitor or participate in Hard Forks or Airdrops. Due to such circumstances, the custodian may not claim the newly created Digital Asset (whether through a Hard Fork and/or an Airdrop) and the client's Digital Assets Account, in such circumstance, would not receive such new Digital Assets, thus losing any potential value from such Digital Assets.

Digital Assets Miners May Cease to Solve Blocks. If the award of new Digital Assets, including Bitcoins or other coins, as applicable, for solving blocks declines and transaction fees are not sufficiently high, miners may not have an adequate incentive to continue mining and may cease their mining operations. Miners ceasing operations would reduce the collective processing power on such Digital Asset network, as applicable, which would adversely affect the confirmation process for transactions (i.e., decreasing the speed at which blocks are added to the blockchain until the next scheduled adjustment in difficulty for block solutions) and make such network more vulnerable to a malicious actor or botnet obtaining control in excess of fifty percent (50%) of the processing power on such network. Any reduction in confidence in the confirmation process or processing power of such network may adversely impact clients.

Computer Malware, Viruses, Bugs, Etc. Computer malware, viruses, and computer hacking and phishing attacks have become more prevalent in the industries in which the Digital Asset exchanges operate, and may occur on such exchanges' systems or technologies. Though it is difficult to determine what, if any, harm may directly result from any specific interruption or attack, any failure to maintain performance, reliability, security, and availability of exchange products and technical infrastructure may harm such exchanges' reputations, their ability to retain existing users and attract new users, and their results of operations.

Digital Asset exchange products and internal systems generally rely on software that is highly technical and complex, and such exchanges' internal systems depend on the ability of such software to store, retrieve, process, and manage immense amounts of data. Such software may now or in the future contain undetected errors, bugs, or vulnerabilities. Some errors may only be discovered after the code has been released for external or internal use. Errors or other design defects within such software may result in a

negative experience for users and marketers who use Digital Asset exchange products, delay product introductions or enhancements, or result in measurement or billing errors. Any errors, bugs, or defects discovered in an exchange's software could result in damage to such exchange's reputations, loss of users, loss of revenue, or liability for damages, any of which could adversely affect such exchange's business and financial results, and could result in significant losses for clients.

Stolen or Incorrectly Transferred Digital Assets May be Irretrievable. Once a transaction has been verified and recorded in a block that is added to the blockchain, an incorrect transfer of Digital Assets or a theft of Digital Assets generally will not be reversible, and a client may not be capable of seeking compensation for any such transfer or theft. It is possible that, through computer or human error, or through theft or criminal action, a client's Digital Assets could be transferred in incorrect amounts or to unauthorized third parties. To the extent that a client is unable to seek a corrective transaction with such third party or is incapable of identifying the third party which has received the client's Digital Assets through error or theft, the client will be unable to revert or otherwise recover incorrectly transferred Digital Assets. To the extent that clients are unable to seek redress for such error or theft, such loss could adversely affect clients.

The foregoing list of risk factors does not purpose to be a complete enumeration or explanation of the risks involved. Clients should read the entire Brochure as well as the other materials that may be provided by Access Softek Advisory Services and consult with their own advisors prior to engaging Access Softek Advisory Services.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Access Softek Advisory Services is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), a futures commission merchant, commodity pool operator, or commodity trading advisor, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

Access Softek Advisory Services does not recommend or select other investment advisers for clients.

Access Softek, Inc.

Our parent company, Access Softek, Inc. provides custom software development for software companies in the Americas, Europe, and Asia, including some Fortune 500 companies, and provides mobile and online banking solutions for the technical needs of financial institutions in the United States. Services and solutions are primarily provided to credit unions and small banks.

Access Softek, Inc. offers Open Financial Exchange (OFX) Server, a client/server-based technology that allows the standardized exchange of data with online banking customers, and other online financial institutions and applications; and Online Account Opening, an online tool to enable new or existing customers to apply for a new account from the convenience of their own computer. The company also provides MFM, a mobile banking platform that allows members and customers of its financial institution clients to access their accounts, make transfers, and perform other commands from their mobile phones; and Orpheus, an online banking platform that provides similar functionality to MFM but in a desktop version. Further, the company provides installation, training, configuration, customization, launch preparation, in-product marketing, support, and adoption services. Furthermore, Access Softek, Inc. offers development services, including product development, custom software development, mobile development, quality

assurance testing, email, security, file format conversions, user interface and graphic design, and reverse engineering.

Access Softek, Inc. formed Access Softek Advisory Services to provide an online, digital investment adviser service option for credit union clients of Access Softek, Inc.

Access Softek is forming a Credit Union Service Organization (CUSO) to hold shares of Access Softek, Inc. Credit unions will be investors/owners of the CUSO. Access Softek will offer to sell up to 20% of its equity to its credit union clients through a newly formed limited liability company ("NEWCO") in Delaware. The price of the NEWCO units ("Units") is based on the valuation of Access Softek determined by Teknos Associates, LLC. Potential investors will have the opportunity to review the appraisal. There will be a minimum subscription amount of Units from each investor ("Individual Minimum Subscription"). There is also an "Aggregate Minimum Subscription". If the Aggregate Minimum Subscription is not met within nine (9) months of the date of the offering, Chris Doner may terminate the offering or the subscribers may terminate their subscription agreement. The sole purpose of NEWCO is to hold shares of Access Softek for the benefit of the owners of NEWCO. Whatever benefits NEWCO receives from being a shareholder of Access Softek, can be distributed to the owners of NEWCO per the decision of the Board. The Board will consist of Chris Doner and representatives elected by the investors.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

According to the Investment Advisers Act, an investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Access Softek Advisory Services has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the Investment Advisers Act, that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. The Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Access Softek Advisory Services requires its supervised persons to consistently act in your best interest in all advisory activities. Access Softek Advisory Services imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Access Softek Advisory Services. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

Access Softek Advisory Services and its supervised persons may buy or sell securities that are also recommended to clients. Securities recommended by Access Softek Advisory Services are widely held and publicly traded. In addition, in accordance with its fiduciary duty to clients, Access Softek Advisory Services and its supervised persons will place client interests ahead of their own interests. Finally, we have developed policies and procedures under our Code of Ethics that require our supervised persons to submit their personal securities holdings and transactions to our Firm. This is done so that we may monitor their investments to ensure compliance with our Code of Ethics and our general fiduciary duty to clients.

Item 12 – Brokerage Practices

With respect to Securities Accounts, Access Softek Advisory Services requires that the clients establish brokerage accounts with DriveWealth, LLC, member FINRA/SIPC, through their institutional platform.

DriveWealth, LLC is an independent (and unaffiliated) SEC-registered broker-dealer and is utilized by Access Softek Advisory Services to maintain custody of clients' assets and to effect trades for their accounts.

With respect to Digital Assets Accounts, Access Softek Advisory Services requires that the clients establish accounts with BitGo. BitGo is a New York State registered trust company and is utilized by Access Softek Advisory Services to maintain custody of clients' Digital Assets and effect trades for their accounts. Prior to engaging Access Softek Advisory Services to provide investment management services, the client will be required to enter into a formal agreement with Access Softek Advisory Services setting forth the terms and conditions under which Access Softek Advisory Services shall manage the client's Digital Assets Account, and a separate custodial agreement with each custodian.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

Access Softek Advisory Services is independently owned and operated and not affiliated with DriveWealth, LLC or BitGo.

The primary factor in suggesting a broker/dealer or custodian is that the services of the recommended firm are provided in a cost-effective manner. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration. The trading process of any broker/dealer, money manager, and custodian suggested by Access Softek Advisory Services must be efficient, seamless, and straight-forward. Overall custodial support services, trade correction services, and statement preparation are some of the other factors determined when suggesting a broker/dealer.

DriveWealth, LLC and BitGo provide us with access to their institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors at no charge to them so long as the independent investment advisors maintain a minimum amount of assets with the custodian.

DriveWealth, LLC and BitGo do not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed by recommended money managers through the custodian or that settle into a custodian account.

These benefits include, but are not necessarily limited to: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk; access to block trading which provides the ability to aggregate securities transactions and allocate the appropriate shares to client accounts; the ability to have investment advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; and access to mutual funds that generally require significantly higher minimum initial investments or are generally only available to institutional investors.

DriveWealth, LLC, BitGo, and HeightZero also make available to us other products and services that benefit our firm but may not benefit clients' accounts. Some of these other products and services assist us in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); provide research, pricing information and other market data; facilitate payment of the firm's fees from its clients' accounts; and assist with back-office functions; record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at a recommended custodian. Access Softek Advisory Services is also providing other services intended to help our firm manage and further develop our business enterprise. These services may include consulting,

publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing.

Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, Access Softek Advisory Services may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, Access Softek Advisory Services has decided to require our clients to use broker/dealers and other qualified custodians determined by Access Softek Advisory Services.

Block Trading Policy

We may elect to purchase or sell the same securities and/or Digital Assets for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when Access Softek Advisory Services believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities and/or Digital Assets among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

Access Softek Advisory Services uses the average price method for transaction allocation. Under this procedure, transactions will be averaged as to price and will be allocated among the firm's clients in proportion to the purchase and sale orders placed for each client account on any given day. If and when we determine to aggregate client orders for the purchase or sale of securities and/or Digital Assets, including securities and/or Digital Assets in which Access Softek Advisory Services or our associated persons may invest, we will do so in accordance with the parameters previously explained and our supervised persons' personal accounts will not receive favorable or special treatment. Neither we nor our associated persons receive any additional compensation as a result of block trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Securities Accounts are reviewed on daily basis by algorithms built into software to identify trades for investing cash, generating cash and rebalancing accounts.

Access Softek Advisory Services' software based financial advisor service assumes that a portfolio will not stay optimized over time and must be periodically rebalanced back to its original targets to maintain the intended risk level and asset allocations. Access Softek Advisory Services reviews each client's account when it is opened, and continuously monitors and periodically rebalances each client's portfolio to seek to maintain a client's targeted risk tolerance and optimal return for the client's risk level. Access Softek Advisory Services also conducts reviews when material changes may have occurred to a client's portfolio or investment objectives.

On a quarterly basis, Access Softek Advisory Services contacts each client to remind them to review and update the profile information they previously provided. Access Softek Advisory Services also requests that

clients reconfirm the same information on an annual basis. These notifications and confirmations include a link to the client's current information and contact information.

Currently, Mark Allen, Portfolio Manager, is responsible for developing investment models, determining appropriate rebalancing procedures and leading all reviews.

Statements and Reports

With respect to the Securities Accounts, clients are provided with transaction confirmation notices and regular quarterly account statements directly from DriveWealth, LLC.

With respect to the Digital Assets Accounts, clients are provided with regular monthly account statements directly from BitGo. Clients may access their Digital Assets Account transaction history through their logged-in access to their Digital Assets Account at the applicable credit union.

Performance information is available through our interactive website, but we do not mail or otherwise deliver performance or position reports to you. Therefore, you must login to view and access any reports we make available to you. Access Softek Advisory Services provides all clients with continuous access via the Site to real-time reporting information about account status, securities positions and balances. Clients may also receive periodic communications describing portfolio performance, Account information, and product features. You are encouraged to always compare any reports or statements provided by us against the account statements delivered from DriveWealth, LLC and BitGo, as applicable. When you have questions about your account statement, you should contact us, DriveWealth, LLC, or BitGo, as applicable.

Item 14 – Client Referrals and Other Compensation

Other than the receipt of investment management fees and transaction-based fees detailed in Item 5 of this Brochure, Access Softek Advisory Services receives no other compensation in connection with our web-based, investment management services.

Access Softek Advisory Services has established marketing arrangements with unaffiliated credit unions whereby Access Softek Advisory Services pays a referral fee which is based upon a portion of the referred client's investment advisory fees and transaction-based fees, as applicable, collected by Access Softek Advisory Services.

With respect to the Securities Accounts, unaffiliated credit unions receive a share of the annual advisory fee received by Access Softek Advisory Services in connection with its investment advisory services for such accounts.

With respect to the Digital Assets Accounts, unaffiliated credit unions receive a share of the transaction-based fees received by Access Softek Advisory Services in connection with its investment advisory services for such accounts.

As a result, unaffiliated credit unions have a conflict of interest when recommending Access Softek Advisory Services over other investment and financial professionals. A prospective client referred by an unaffiliated credit union is under no obligation to utilize the investment advisory services of Access Softek Advisory Services. A prospective client referred by Access Softek Advisory Services is urged to make his or her own independent investigation and evaluation of Access Softek Advisory Services. Selecting a professional investment advisor is an important decision that should not be based solely on recommendations from your credit union or other marketing initiatives.

A client referred to Access Softek Advisory Services by an unaffiliated credit union should understand the following:

- Access Softek Advisory Services is not a credit union or any other type of financial depository institution.
- With respect to the securities and Digital Assets, as applicable, recommended or selected by Access Softek Advisory Services, such securities and Digital Assets
 - Are not insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Administration (NCUA);
 - Are not endorsed or guaranteed by the bank or credit union; and
 - Are subject to investment risks, including possible loss of principal invested.

Clients may only engage Access Softek Advisory Services' services through referral from their credit union; each credit union has discretion to determine the exact fee schedule for our services and the exact fee we pay the credit union in the form of a solicitor fee.

Therefore, although the fee retained by Access Softek Advisory Services does not vary, the total fee charged to clients will vary due to each credit union determining the specific fee schedule applied to the client's account(s) so long as the fee schedule is within the limits detailed in Item 5 of this Brochure.

For example, one credit union may decide to assess a maximum annual fee of 0.50% while another credit union can decide to set 0.55% as the maximum annual fee. The engagement may result in an additional charge to the client in excess of what the client would have paid if the client were to engage the services of Access Softek Advisory Services through a different credit union. Variations in the credit union's compensation are due to internal factors determined by each credit union such as personnel and resource commitment to offer Access Softek Advisory Services through the credit union's platform and regional location considerations.

When a client is referred to us by an unaffiliated credit union, the credit union provides the client with a copy of this Disclosure Brochure along with a Solicitor's Disclosure Statement document. Referral agreements between Access Softek Advisory Services and unaffiliated credit unions are in compliance with state and federal securities rules regarding paid solicitor arrangements.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Access Softek Advisory Services does not maintain physical possession of client funds, securities, or Digital Assets, but Access Softek Advisory Services is deemed to have custody of client funds and securities whenever Access Softek Advisory Services is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Access Softek Advisory Services will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

We have established procedures to ensure all client funds, securities, and Digital Assets are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds, securities, and Digital Assets are maintained. Finally, account statements are delivered directly from the applicable qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Access Softek

Advisory Services. When clients have questions about their account statements, they should contact Access Softek Advisory Services or the applicable qualified custodian preparing the statement.

Item 16 – Investment Discretion

Our investment advisory services are provided on both a discretionary and non-discretionary basis.

With respect to the Securities Accounts, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. You must grant us with discretionary trading authority in the client agreement you execute through our interactive website.

With respect to the Digital Assets Accounts, we manage the account by issuing non-discretionary trading instructions to you, and you may then authorize, in your sole discretion and, in such case, the trading instructions will be sent to the custodian for execution. We may not issue trading instructions to the custodian to buy, invest in, hold for invest, own, assign, transfer, sell, exchange, trade in, lend, pledge, deliver and otherwise deal in Digital Assets for your portfolio without obtaining your consent for each transaction. You must grant us with non-discretionary trading authority in the client agreement you execute through our interactive website.

Item 17 – Voting Client Securities

Access Softek Advisory Services does not vote proxies on behalf of clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in the Securities Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this Brochure. Access Softek Advisory Services does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Access Softek Advisory Services has not been the subject of a bankruptcy petition at any time.

Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Access Softek Advisory Services does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Commitment to Your Private Information. Access Softek Advisory Services is committed to safeguarding the confidential information of its clients. Access Softek Advisory Services holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, the firm does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, the firm will provide clients with written notice and clients will be provided an opportunity to direct Access Softek Advisory Services as to whether such disclosure is permissible.

Why We Collect and How We Use Information. To conduct regular business, Access Softek Advisory Services may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm.
- Information about the client's transactions implemented by the firm or others.
- Information developed as part of analyses or investment advisory services.

To administer, manage, service, and provide related services for client accounts, it is necessary for Access Softek Advisory Services to provide access to customer information within the firm and to nonaffiliated companies, with whom the firm has entered into agreements with. To provide the utmost service, the firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the firm's behalf.

- Information Access Softek Advisory Services receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions.
- Information about a client's financial products and services transaction with Access Softek Advisory Services.

Sharing Information with Other Companies Permitted Under Law. Since Access Softek Advisory Services shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. However, the firm may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that the firm has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure.

Former Customers. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.