

ASSET STRATEGY ADVISORS, LLC

Form ADV – Part 2A: Firm Brochure

SEC File No. 801-66549

14 W. Plain St., Suite 201
Wayland, MA 01778
Telephone: 781-235-4426
www.assetstrategy.com

March 31, 2026

This brochure provides information about the qualifications and business practices of Asset Strategy Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at www.assetstrategy.com or 781-235-4426. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state securities authority.

Additional information about Asset Strategy Advisors, LLC is also available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide a description of those material changes.

Since our last annual updating amendment, dated March 2025, we have the following material changes to report:

1. Office Address Change

We have relocated our principal office. Our current address is:

14 W. Plain St., Suite 201, Wayland, MA 01778

2. Ownership Disclosure Update

Asset Strategy Advisors, LLC is owned and controlled by Asset Strategy Holdings LLC and Kent Fitzpatrick.

3. Privacy Policy Update

The brochure supplement privacy policy language has been updated to match the firm's current privacy policy.

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our 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 a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4 – Advisory Business

About the Firm

Asset Strategy Advisors, LLC (ASA or the “Firm”) is an investment advisory firm registered with the Securities and Exchange Commission (“SEC”) under the Investment Advisers Act of 1940, with its principal place of business in Massachusetts. The firm began conducting business in 2007. The firm provides wealth management services to individuals and retirement plan consulting to corporate and non-profit institutions. Asset Strategy Advisors, LLC is owned and controlled by Asset Strategy Holdings LLC and Kent Fitzpatrick.

Retirement Plan Consulting Services

We offer several advisory services for corporate and non-profit retirement plans, separately or in combination. The primary clients for these services are pension, profit sharing, and participant-directed individual account plans (i.e., 401(k), 403(b), etc.).

Specifically, we offer (1) Discretionary Investment Management Services, (2) Non-Discretionary Investment Advisory Services, and/or (3) Retirement Plan Fiduciary Services to employer-sponsored retirement plans and their participants in either an ERISA 3(38) fiduciary or ERISA 3(21) co-fiduciary capacity. Depending on the type of plan and the specific arrangement with the plan sponsor, we may provide one or more of these services. Prior to being engaged by the plan sponsor, we will provide a copy of this Form ADV Part 2A along with a copy of our Privacy Policy and the applicable Agreement containing the information required to be disclosed under Section 408(b)(2) of the Employee Retirement Income Security Act (“ERISA”), as applicable.

For qualified retirement plan clients, ASA may recommend investments across a range of vehicles, including mutual funds, exchange traded funds (ETFs), and, where appropriate, Collective Investment Trusts (CITs). CITs are pooled investment vehicles available only to qualified retirement plans and certain governmental plans; they are not available to individual retail investors. CITs may offer cost advantages compared to comparable mutual fund share classes, which may benefit plan participants. ASA evaluates CITs using the same analytical framework applied to other investment vehicles.

In providing Retirement Plan Services, a plan participant or beneficiary may request additional services. Asset Strategy may establish a separate client relationship with one or more plan participants or beneficiaries through a separate agreement. Such client relationships may develop in various ways, including:

- as a result of a decision by a plan participant or beneficiary to purchase services from Asset Strategy not involving the use of plan assets;
- as part of an individual or family financial plan involving recommendations concerning assets held outside of the plan; and/or
- through a rollover of an Individual Retirement Account or Roth IRA (“IRA Rollover”).

If a plan participant or beneficiary desires to effect an IRA Rollover from the plan to an account advised or managed by Asset Strategy, or if we recommend a rollover, we will have a conflict of interest

given that our IRA advisory fees can reasonably be expected to be higher than those we receive in connection with Retirement Plan Services, due to the individualized nature of our IRA-related services. To mitigate such conflicts, Asset Strategy will disclose relevant information about the applicable fees we charge for advising or managing an IRA prior to opening an account to receive the IRA rollover. The decision as to whether to take a distribution from any retirement account rests solely with the individual participant and beneficiary.

Department of Labor Acknowledgement of Fiduciary Duty

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. 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 yours 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 your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

ERISA Fiduciary Status

Asset Strategy Advisors, LLC is a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), with respect to investment management services and investment advice provided to ERISA plan clients, including plan participants. ASA is also a fiduciary under Section 4975 of the Internal Revenue Code of 1986, as amended (the "IRC"), with respect to investment management services and investment advice provided to individual retirement accounts ("IRAs"), ERISA plans, and ERISA plan participants.

As such, ASA is subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules intended to prevent fiduciaries from acting on conflicts of interest. When a fiduciary gives investment advice, the fiduciary must either avoid certain conflicts of interest or rely upon an applicable prohibited transaction exemption. ASA has implemented policies and procedures designed to identify and manage such conflicts in a manner consistent with its fiduciary obligations.

Individual Wealth Management Services

ASA offers investment management and financial planning services for individual clients encompassing, but not limited to, the following:

- Personal Financial Planning
- Insurance and Estate Planning
- Capital Need Analysis
- Tax & Cash Flow Planning
- Retirement Planning
- Investment Analysis and Planning
- Education Planning
- Performance Reports

Financial planning information will be obtained through personal interviews with clients concerning their current financial status, future goals and attitudes towards risk. Data gathered and related documents supplied by clients are carefully reviewed, and a written report is issued.

Clients are under no obligation to act on our recommendations. If you elect to act on any or all of the recommendations, you are under no obligation to effect the transactions through an associated person of ASA. If you choose to use ASA or an affiliate to implement any recommendations from the financial plan, those activities are separate and distinct from the financial planning services provided by ASA under a planning services agreement.

The fee structure for these services can be based on a percentage of assets under management, or a fixed or hourly fee. Such investment advisory services include setting investment objectives with clients, creating a financial plan, providing online aggregation tools, determining appropriate asset allocation, discussing suggested trades with clients, and monitoring existing and prospective investments in light of the client's objectives and risk tolerance on a continuous basis.

Third-Party Program Consulting Services

Clients inform their ASA Investment Adviser Representatives (IAR) of their investment objectives, risk tolerance, and investment time horizon, as well as any investment policies, guidelines, or reasonable restrictions applicable to the assets they designate for investment through advisory programs. Based on the information provided, the IAR assists the client in selecting one or more third-party advisory programs.

ASA may provide additional consulting services in connection with particular programs. The consulting services that the ASA IAR provides in connection with a particular program are set forth in the agreement that the client signs with ASA. These services may include assistance with the selection of portfolio managers, investment strategies, and the allocation of assets among managers or strategies. The client will receive a disclosure brochure describing each program selected and, where applicable, each portfolio manager selected. Clients should carefully review these materials before deciding whether to invest through a particular program or select a particular portfolio manager.

Investment Adviser Representative Managed Account Services

ASA IARs may also manage client accounts through various account structures available through the ASA platform. Most accounts are managed on a discretionary basis. This trading discretion and any limitations on it will be set forth in the client's agreement with ASA. In each account structure, the IAR may manage and provide advice on mutual funds, stocks, bonds, separately managed accounts and ETFs. All account structures give IARs the ability to customize asset allocation, investment selection, and investment strategies to meet each client's individual financial situation and investment goals.

Several factors may influence the selection of the account structure, including but not limited to:

- the client's preference for a "wrap" fee vs. transaction charges per trade
- account size
- anticipated trading frequency
- anticipated securities to be traded
- management style
- long-term investment goals

The IAR's services are tailored to the individual needs of each client. The IAR assists the client in establishing and monitoring client investment objectives, risk tolerance, asset allocation goals and time horizon. Clients have the opportunity to place reasonable restrictions on the way their accounts are managed; however, such restrictions may cause the IAR to deviate from strategies or recommendations that would otherwise apply, and the account's performance may be lower than it otherwise would have been.

Technology Platforms and Third-Party Services

Flourish Cash

Flourish Cash is an online platform that provides clients with competitive APY and elevated FDIC coverage for deposits placed at participating program banks. Flourish Cash is offered by Flourish Financial LLC, a registered broker-dealer. Asset Strategy Advisors, LLC is not affiliated with Flourish or any of the participating banks, and is not acting in an investment advisory or discretionary capacity when inviting clients to use Flourish. Clients do so only with their express consent. Clients should visit the Flourish website for information regarding the cash program and other investment offerings.

Pontera

ASA uses the Pontera platform to facilitate management of held-away assets, such as defined contribution and defined benefit plan participant accounts, on a discretionary basis. The Pontera platform is structured so that ASA does not obtain direct access to client log-in credentials, which avoids a custody determination. ASA is not affiliated with Pontera and receives no compensation from Pontera for use of the platform. Once a client connects an account to the platform, ASA will review current allocations and rebalance the account as deemed necessary, taking into account the client's investment goals, risk tolerance, and current market conditions. Client accounts will be reviewed at least quarterly.

Assets Managed

As of December 31, 2025, we advise on assets totaling \$649,280,560. The following is the breakdown of assets:

Discretionary: \$220,538,236

Non-Discretionary: \$428,742,324

Item 5 – Fees and Compensation

ASA is compensated for its advisory services as set forth below. All fees are subject to negotiation. The specific manner in which fees are charged by ASA is established in the client's written investment advisory agreement with ASA, or the third-party program sponsor, as applicable.

Retirement Plan Consulting Services – 3(21) & 3(38) Investment Advisory Fees

ASA's advisory fee for retirement plan clients is invoiced quarterly, in arrears, based on the market value of the funds under advisement on the last business day of the previous quarter. ASA's minimum fee is \$1,250 per quarter, subject to a negotiated asset-based fee determined by the specific circumstances of the plan, including plan asset levels, the scope of services provided, and expected growth in assets. All fees are negotiable. Existing clients may be subject to a different fee schedule, and some clients' fees may be higher or lower than the minimum described herein.

In some circumstances, clients may be charged an hourly rate (negotiated) for certain plan-related project work, such as plan design analysis, participant education programs, or vendor search projects.

ASA may also receive certain fees from custodial platforms and other revenue-sharing compensation from mutual fund providers for providing shareholder services and administrative services for mutual funds purchased under the Plan. Any and all compensation and revenue-sharing payments received by ASA from these custodial platforms and/or mutual funds are used to offset administrative services and recordkeeping fees billed by ASA to its clients, as well as to offset fees charged by the plan custodian or other professional service providers. Quarterly invoices sent to ASA clients illustrate total fees payable to ASA, less revenue-sharing income. To the extent revenue-sharing income exceeds the fee payable, ASA may, at the Plan Sponsor's discretion, set up a revenue recapture account or place the income into the applicable client's Plan.

The client may instruct ASA to work with a sub-adviser who will research, select and recommend securities for inclusion within the retirement plan. For instances in which a sub-adviser is utilized, the sub-adviser may charge an additional fee and the overall fees may be higher than those listed above. All fees and services, including those of any sub-adviser, are detailed in the service agreement between all parties associated with the plan.

Retirement plan clients may terminate plan consulting and/or advisory services by providing sixty (60) days' advance written notice to ASA. Any fees due to ASA for services provided prior to the date of termination will be payable upon receipt of invoice.

Individual Wealth Management Services – Advisory Fees

Our annual fees for Individual Wealth Management and Portfolio Management Services are based upon a percentage of assets under management. Fees are generally paid quarterly, in advance or in accordance with the agreement, based on the value at the close of the billing period. The initial invoice is calculated based upon the fair market value of the account at the time the agreement is executed

through the end of the current calendar quarter. Thereafter, fees are calculated based upon the market value of the portfolio (not including cash) as of the last business day of the previous quarter.

ASA's fees may be deducted directly from the custodial account; the client should review the correctness of the fee, as some custodians do not perform this function. The annualized fee is charged either as a flat fee negotiated with the client (generally with a cost-of-living adjustment), or as a percentage of assets under management according to the following schedule:

Assets Under Management	Annual Fee
\$0 – \$2 million	1.00% – 1.50%
\$2 – \$5 million	0.75% – 1.25%
\$5 – \$10 million	0.50% – 1.00%
Over \$10 million	Negotiable

Hourly Fees

When a client engages ASA to perform a specific one-time service, such as a one-time portfolio review or financial analysis, ASA generally charges based upon an hourly rate of \$250–\$500 per hour. The hourly rate is based upon the knowledge and experience of the individual providing the work. Hourly fees are billed monthly, with payment due within 30 days of receipt of invoice. Invoices may be delivered via U.S. Mail or email, depending upon the client's preference.

Fixed Fees

For certain specific engagements, the client may negotiate a fixed fee. A primary example is financial planning. Fixed fees are determined on a client-by-client basis, reflecting the estimated number of hours to complete the work and the complexity of the engagement; accordingly, there is no standard fee range to disclose. All fixed fees are agreed upon prior to engagement and fully disclosed in the Agreement between ASA and the client.

Generally, an initial deposit equal to one-half (50%) of the agreed fee is payable at the time of entering into the Agreement, with the balance due upon presentation of the completed work. If the client elects to terminate the engagement within five (5) business days of signing the Agreement, the deposit will be fully refunded. Once work has commenced, any refund of the deposit will be prorated based on hours expended at the applicable hourly rate through the date of termination.

General Information Regarding Fees

- Fees, account minimums and payment terms are negotiable.
- Fees are not charged based on capital gains or capital appreciation of client assets in any manner prohibited by the Investment Advisers Act of 1940.

- Advisory fees charged by ASA are separate and distinct from advisory fees and expenses charged by mutual funds or other investment vehicles in which client assets are invested. A complete description of fund fees and expenses is disclosed in each fund's prospectus or offering document.
- Fees such as 12b-1 fees paid to ASA by a mutual fund are credited against the overall quarterly advisory fee charged to the client. ASA believes that retaining such fees in addition to charging advisory fees would create a conflict of interest and may incentivize product recommendations based on compensation rather than client needs.
- Clients may also incur charges imposed by third parties, including brokerage transaction costs, custodial fees, mutual fund transaction fees, deferred sales charges on mutual funds transferred into the account, and IRA or qualified retirement plan fees. See also Item 12 – Brokerage Practices.
- Either party may terminate the Agreement at any time upon receipt of written notice. Upon termination, any unearned fees will be promptly refunded on a prorated basis for the number of days remaining in the billing period.
- Clients should be aware that similar advisory services may be available from other registered or unregistered investment advisers for a higher or lower fee.
- ASA does not require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Flourish Cash

Asset Strategy Advisors, LLC receives an administrative/service annual fee of 0.20% of the value of a client's Flourish Cash account when the client participates in the Flourish cash management program. This fee is deducted from the client's overall APY and is not negotiable. Client cash accounts held through Flourish are not included in the calculation of ASA's asset-based management fees.

Pontera

Asset Strategy Advisors, LLC receives no compensation from Pontera for use of their platform. Held-away assets managed through Pontera may be included in the calculation of assets under management for purposes of ASA's advisory fee, as set forth in the client's advisory agreement.

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

Asset Strategy Advisors, LLC does not charge performance-based fees (fees based on a share of capital gains on, or capital appreciation of, client assets). ASA may, however, negotiate alternative fee structures on a client-by-client basis, as noted in Item 5.

Item 7 – Types of Clients & Account Requirements

ASA provides portfolio management services primarily to corporate pension and profit-sharing plans and high-net-worth individuals. We also serve trusts, estates, charitable institutions, foundations and endowments. ASA generally does not impose minimum account size requirements for opening or maintaining an account. However, certain third-party programs and/or portfolio managers may impose minimum account size requirements, as disclosed in the applicable program brochure.

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

Please be aware that investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Investment Research and Portfolio Construction

ASA follows a disciplined research and evaluation process to determine appropriate investments for each client based on their individual objectives and risk profile. ASA has the expertise and analytical tools to evaluate investments across the available universe of funds, collective investment trusts (CITs), and mutual fund families, encompassing a wide range of investment managers and asset classes. CITs are available exclusively within qualified retirement plans and are evaluated alongside comparable mutual fund alternatives to identify the most cost-effective and risk-appropriate options for plan clients.

ASA's investment process employs both quantitative and qualitative analysis to identify and evaluate key investment managers across a broad spectrum of asset classes. Quantitative analysis considers factors such as historical risk-adjusted performance, expense ratios, turnover, and factor exposures. Qualitative analysis considers the investment manager's philosophy, organizational stability, and adherence to stated investment discipline. This two-pronged approach enables ASA to construct a roster of investment managers that reflects our best thinking on portfolio construction for each client relationship.

ASA does not employ a "one-size-fits-all" investment strategy. Investment strategy is determined on a client-by-client basis in consideration of the client's overall objectives, goals, needs and risk tolerance. ASA maintains databases on traditional money managers and mutual funds and analyzes mutual fund fundamentals, including review of the fund manager, asset allocation, past performance and expenses.

ASA primarily invests client assets in mutual funds, ETFs, CITs (for eligible retirement plan accounts), and separately managed accounts. We generally purchase with the intent to hold for an extended period. A risk of this long-term strategy is that we may not take advantage of short-term opportunities, and, if our assessment proves incorrect, a security may decline in value before we decide to sell.

ASA does not employ margin transactions, short sales, or covered and uncovered security and index options transactions, as these are deemed to carry heightened risk. ASA does not participate in Initial Public Offerings (IPOs); any IPO activity requested by a client is the sole responsibility of the client.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the adviser or the integrity of the adviser's management. Asset Strategy Advisors, LLC has no legal or disciplinary events to disclose under this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Asset Strategy Advisors, LLC is an independent investment adviser providing investment advisory and ancillary services as described in this Disclosure Brochure. The firm does not offer proprietary products and is not engaged in any business activities or services other than those described herein.

ASA and its investment adviser representatives maintain the following affiliated relationships. These affiliations create conflicts of interest because affiliated persons may receive separate compensation when clients utilize affiliated services. Clients are under no obligation to use any affiliated firm or representative. All affiliated services are governed by separate agreements with separate compensation arrangements.

Concorde Investment Services, LLC

Some investment adviser representatives are affiliated with Concorde Investment Services, LLC, a registered broker-dealer. Clients that choose to engage affiliated brokerage services will enter into a separate agreement with Concorde that sets forth the applicable fees and charges, which are in addition to any management fees paid to ASA.

Asset Strategy Financial Group, Inc.

Some investment adviser representatives are licensed insurance representatives of Asset Strategy Financial Group, Inc., a licensed insurance agency. In this capacity, they may offer and sell various insurance products and receive commissions on such sales. Clients that choose to engage affiliated insurance services will enter into a separate agreement with Asset Strategy Financial Group, Inc. setting forth the applicable fees and charges, which are in addition to any management fees paid to ASA. Commissions vary by product.

Asset Strategy Realty Partners, LLC

Some investment adviser representatives are licensed real estate agents of Asset Strategy Realty Partners, LLC, a real estate agency. In this capacity, they may offer and facilitate real estate transactions and receive commissions. Clients that choose to engage affiliated real estate services will enter into a separate agreement with Asset Strategy Realty Partners, LLC setting forth the applicable fees and charges, which are in addition to any management fees paid to ASA.

Asset Strategy Tax Consultants, LLC

Asset Strategy Advisors, LLC and Kent Fitzpatrick own Asset Strategy Tax Consultants, LLC (ASTC), which provides tax planning and consulting services. Clients needing tax planning or consulting assistance may be referred to ASTC. These services are independent of ASA's financial planning and investment advisory services and are governed by a separate engagement agreement. Clients have the option, but not the obligation, to engage ASTC for such services.

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

ASA has adopted a Code of Ethics that sets forth high ethical standards of business conduct required of all employees, including compliance with applicable federal securities laws. Upon hire, each employee receives a copy of the Code of Ethics and acknowledges receipt in writing.

ASA and its personnel owe a duty of loyalty, fairness and good faith to our clients, and are obligated to adhere not only to the specific provisions of the Code of Ethics but to the general principles underlying it.

ASA and its associated persons may buy or sell securities identical to those recommended to clients. Because of this potential commonality of interest, ASA has adopted a Code of Ethics and Statement on Insider Trading with which all employees must comply at all times. Key provisions include:

- Each associated person of ASA is required to disclose in writing upon hire any and all accounts held at a securities firm, and must authorize ASA to receive copies of monthly statements. Statements are reviewed by the Chief Compliance Officer for the purpose of identifying any violations.
- In its capacity as adviser to a retirement plan of a publicly traded company, ASA recognizes that it may at times obtain material non-public information about that company. Upon entering into such an advisory relationship, ASA will restrict its associated persons from purchasing or selling securities of that client company.
- Any associated person registered as a representative of a broker-dealer is required to comply with that broker-dealer's guidelines regarding Initial Public Offering securities.
- ASA has established procedures for the maintenance of all required books and records.
- All associated persons of ASA must act in accordance with applicable federal and state regulations governing registered investment advisers.

- Any associated person of ASA who violates any provision of the Code of Ethics may be subject to termination.
- A copy of the Code of Ethics is available upon request. You may request a copy by email at info@assetstrategy.com or by phone at 781-235-4426.

Item 12 – Brokerage Practices

Custodian Relationships

To facilitate accurate and timely management of invested assets, ASA requires clients to establish an account with a designated “qualified custodian,” as that term is defined under Rule 206(4)-2(d)(6) of the Investment Advisers Act of 1940. The custodian maintains the underlying records for the assets held in client accounts, and ASA will not serve as custodian for client advisory assets. Clients are solely responsible for paying all fees and charges of the custodian, as stated in their agreement with the custodian.

ASA’s clients generally maintain their accounts at one of the following qualified custodians:

- Altruist Financial LLC (Member FINRA/SIPC) (“Altruist”)
- Betterment Securities (MTG, LLC dba Betterment Securities, Member FINRA/SIPC) (“Betterment”)
- Fidelity Institutional Wealth Services (Fidelity Brokerage Services LLC, Member NYSE/FINRA/SIPC) (“Fidelity”)
- Charles Schwab & Co., Inc. (Member NYSE/FINRA/SIPC) (“Schwab”)

Although ASA may recommend a particular custodian based on factors such as technology capabilities, fee structure, and client service, the client retains the right to direct the use of a specific custodian. When the client directs the custodian, ASA will not negotiate transaction costs or custodial fees on the client’s behalf, which may result in transaction costs higher than those of other ASA clients and may limit the advantages of trade aggregation.

Discretionary Clients

For discretionary client accounts, ASA and the client agree on the asset classes to be utilized and the approximate allocation to each class. Associated persons of ASA may recommend Fidelity or Charles Schwab for custody and trade execution. In such cases, the associated person will negotiate costs on the client’s behalf. Certain associated persons, as registered representatives of Concorde Investment Services, LLC, may receive commissions on securities transactions and/or 12b-1 fees on certain mutual fund sales. This relationship may constitute a conflict of interest. ASA will offset the advisory fee charged to the client for any 12b-1 fees received, as disclosed on the quarterly invoice.

ASA does not direct brokerage transactions to brokers in exchange for research or other products or services (“soft dollar” arrangements).

Item 13 – Review of Accounts

ASA generally monitors client accounts on a quarterly basis; however, reviews may also be triggered by new deposits, material changes in the client's financial situation, changes in economic conditions, or at the client's direction. Reviews encompass analysis of securities, market sensitivity, economic changes, investment results and asset allocation to ensure the investment strategy continues to meet the client's objectives.

The portfolio manager responsible for the client relationship is the primary reviewer. ASA encourages frequent client contact but will initiate contact no less than annually. ASA prepares quarterly reports that generally include security holdings, performance and general market commentary. In addition, clients receive holdings and activity reports at least quarterly from the custodian or brokerage firm.

Item 14 – Client Referrals and Other Compensation

Asset Strategy Advisors, LLC does not currently have any referral arrangements or referral compensation programs in place. We do not pay for client referrals and we do not receive compensation for referring clients to third parties.

Item 15 – Custody

You will receive at least quarterly statements from the qualified custodian that holds and maintains your assets. ASA does not take physical custody of client funds or securities. Clients who also receive account reports from their Investment Adviser Representatives are strongly encouraged to compare those reports to the official statements received from the qualified custodian. Account information provided by ASA or your IAR is for informational purposes only.

Item 16 – Investment Discretion

Investment Adviser Representatives ordinarily provide advisory services on a non-discretionary basis. Clients may retain ASA to provide discretionary asset management services, in which case ASA will place trades without contacting the client prior to each transaction.

ASA's discretionary authority includes the ability to determine, without prior client contact:

- the security to buy or sell; and/or
- the amount of the security to be bought or sold.

Discretionary authority is granted when the client signs an Agreement with ASA. Clients retain the right to restrict this authority through written instruction. Examples of restrictions include limitations on security types, industry groups, or sector allocations. Discretionary authority does not generally include the ability to transfer assets out of an account. Clients may amend or revoke restrictions at any time by providing ASA with written instructions.

Item 17 – Voting Client Securities

ASA does not vote proxies for clients and does not provide advice on how to vote proxies. Clients retain sole authority to vote proxies and are responsible for ensuring that proxy materials are sent directly to them.

Item 18 – Financial Information

We are not required to provide financial information in this Brochure, as we do not require prepayment of more than \$1,200 in fees six or more months in advance. We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients, and we have never been the subject of a bankruptcy proceeding.

Supplement – Privacy Policy

Asset Strategy Advisors, LLC is committed to maintaining the confidentiality, integrity and security of personal information about our current and prospective clients. We consider client privacy fundamental to our relationship with clients. It is therefore our policy to respect the privacy of current and former clients and to protect the personal information entrusted to us. This policy describes the steps we have taken to safeguard your information and what client information we may share with others.

You do not have to contact us to benefit from our privacy protections; they apply automatically to all of our clients.

Information We Collect and Maintain

We collect and share with others (as necessary) the following types of personal information about you:

- Information we receive from you to open an account or provide investment advice (such as your home address, telephone number, Social Security or taxpayer identification number, email address, age, marital status, assets, and income and financial information);
- Information that we generate to service your account (such as trade tickets and account statements); and
- Information that we may receive from third parties with respect to your account (such as trade confirmations).

Information We Disclose

We will not disclose any non-public personal information about you or your account(s) to anyone unless one of the following conditions is met:

- The firm receives your prior written consent;
- The firm believes the recipient is your authorized representative;
- Disclosure is necessary to effect or process a transaction in your account, or to maintain or service your account(s); or
- The firm is required by law to disclose information to the recipient.

In all such situations, we stress the confidential nature of information being shared. We may share your personal information with non-affiliated companies that provide processing, account maintenance and related services, and with government agencies only to the extent permitted or required by law.

How We Protect Personal Information

We maintain the confidentiality, security and integrity of your non-public personal information by restricting access to those employees with a legitimate need for the information, and by maintaining physical, electronic and procedural safeguards that meet or exceed federal and industry standards. We

have not and will not sell your personal information to anyone, even if our formal client relationship ends.

Online Privacy

Privacy, security and service in our online operations are just as critical as in the rest of our business. When you visit our website, we may collect technical and navigational information, such as computer browser type, internet protocol address, pages visited, and average time spent on our site. This information may be used to alert you to software compatibility issues or to improve our web design and functionality.

Privacy Policy Updates

From time to time, we may amend our privacy policy. You will receive appropriate notice when our privacy policy changes.

Contact Us with Privacy Questions

Our relationship with you is one of our most vital assets. We recognize that you have entrusted us with private financial information, and we will do our utmost to maintain that trust. For questions concerning our privacy policy, please contact us by phone at (781) 235-4426.

The policies and practices described above apply to both current and former clients.