

Firm Brochure
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Sachetta & Callahan, LLC. If you have any questions about the contents of this brochure, please contact us at: 781-233-4138, or by email at: info@sachetta.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Sachetta & Callahan, LLC is available on the SEC's website at www.adviserinfo.sec.gov

October 16, 2018

Sachetta & Callahan, LLC

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the last annual filing of our Form ADV Part 2A, we have the following material changes to report:

- There have been no material changes to our Form ADV Part 2A

Our current Form ADV, Part 2A is available to our existing and prospective clients 24 hours a day through the Investment Adviser Public Disclosure website. Additionally, we will annually and within 120 days of the end of our fiscal year, provide you either: (i) a copy of our Form ADV, Part 2 that includes or is accompanied by a summary of material changes; or (ii) a summary of material changes that includes an offer to provide a copy of the current Form ADV, Part 2A. We urge you to carefully review all subsequent summaries of material changes, as they will contain important information about any significant changes to our firm, including but not limited to advisory services, fee structure, business practices, conflicts of interest, and disciplinary history.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 781-233-4138 or by email at: info@sachetta.com

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Advisory Business

Firm Description

Sachetta & Callahan, LLC, was founded in 1984 as Sachetta & Company, LLC. In 2013, Infinite Wealth Management, Inc. and Sachetta & Company, LLC merged to form the single firm of Sachetta & Callahan, LLC. The owners of Sachetta & Callahan, LLC have remained the same as they were as Infinite Wealth Management, Inc.

On August 5, 2013, Sachetta & Callahan, LLC acquired Financial Planning Horizons, Inc. of Portsmouth, NH

On August 3, 2015, Sachetta & Callahan, LLC acquired Quest Financial Services, Inc. of Lynnfield, MA

Sachetta & Callahan, LLC provides personalized confidential tax preparation, financial planning and investment management to individuals, profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, tax preparation, insurance review, investment management, education funding, retirement planning, and estate planning.

Sachetta & Callahan, LLC is a fee-based tax, financial planning and investment management firm. The firm does not receive commissions for purchasing or stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm does receive commissions from the sale of insurance and annuity products. No finder's fees are accepted.

Sachetta & Callahan, LLC does not act as a custodian of client assets. The client always maintains asset control. Sachetta & Callahan, LLC places trades for clients under a limited power of attorney.

Other professionals (e.g., lawyers, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone or in person, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Joseph Sachetta, Michael Callahan, and Stephen Sachetta are each 33.33% owners.

Types of Advisory Services

Sachetta & Callahan, LLC provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services and furnishes investment advice through consultations.

Sachetta & Callahan, LLC also furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and other services that often include estate planning.

Sachetta & Callahan, LLC may receive commissions as the result of life insurance and/or fixed annuity sales.

As of January 31, 2018, Sachetta & Callahan, LLC manages approximately \$193 million in assets for approximately 360 clients, all on a discretionary basis.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$3,500.

Follow-on implementation work is billed separately at the rate of \$200 per hour.

Wealth Management Advisory Agreement

Most clients choose to have Sachetta & Callahan, LLC manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the

client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. Sachetta & Callahan, LLC offers these clients our investment management services, financial planning services, unlimited consultations, and the annual preparation of their personal income tax returns.

The annual Wealth Management Advisory Agreement fee is equal to 1% per year on all assets managed.

The minimum annual fee is \$3,500 and is not negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Wealth Management Advisory Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The average portfolio value for the month prior to termination is used as the basis for the final fee computation, adjusted for the number of days during the billing month prior to termination.

Tax preparation work is performed as an integral part of the Wealth Management Advisory Agreement. Eligible federal and applicable state returns are filed electronically without an additional fee.

Simplify XY Automatic Investment Program

Our firm also offers portfolio management services through Simplify XY, a managed account platform made available to investment advisers through Fidelity's independently operated affiliate, eMoney Advisor, LLC (eMoney). Simplify XY provides our firm and its clients a digital advice offering with investment subadvisory services provided by third-party money managers (Third Party Managers). Among other things, Simplify XY allows our firm to collect client information and develop client profiles used to construct, manage and select investment models. Services provided by Fidelity and its affiliate National Financial Services LLC to support Simplify XY include certain brokerage and custodial functionality made available through technology integration with eMoney. Sachetta & Callahan, LLC, and not Fidelity, is the client's investment advisor and primary point of contact with respect to Simplify XY. Sachetta & Callahan, LLC is solely responsible, and Fidelity is not responsible, for determining the appropriateness of Simplify XY for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and overseeing that portfolio on an ongoing basis. Clients do not pay fees to Fidelity or eMoney in connection with Simplify XY, but Sachetta & Callahan, LLC does charge clients a fee for its

services as described below. Sachetta & Callahan, LLC's fees are not set or supervised by Fidelity or eMoney.

Simplify XY may be appropriate for clients who do not desire/require ongoing communications with Sachetta & Callahan, LLC regarding their investment portfolios and are comfortable with the technological aspects of Simplify XY.

Simplify XY clients are charged a fixed \$100 monthly fee and an additional fee equal to 0.50% per year on all assets managed. Clients invested through Simplify XY may be eligible for variable fee credits as determined and calculated by Fidelity.

Hourly Planning Engagements

Sachetta & Callahan, LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.

Asset Management

Assets are invested primarily in no-load mutual funds and exchange-traded funds through our account custodians. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. There may be a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Sachetta & Callahan, LLC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Sachetta & Callahan, LLC.

Income Tax Preparation

Sachetta & Callahan, LLC provides tax preparation services to individuals and small businesses. Individual clients who meet our minimum fee of \$3,500 per year receive their income tax preparation at no additional cost. Individuals and small businesses who engage us for these services outside of a Wealth Management Advisory Agreement do so at a separately negotiated fee.

Insurance and Fixed Annuity Sales

Sachetta & Callahan, LLC provides life insurance and fixed annuity sales to interested clients. We may receive a commission on these sales, and they in

no way effect any Asset Management, Financial Planning, or Income Tax Preparation fees. These sales are typically provided during the financial planning process, and clients are invited to take advantage if interested. Clients are welcome to purchase their insurance and/or fixed annuities from another provider without any adverse effect to any other relationship we may have. Our Massachusetts insurance license number is 1980060.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Sachetta & Callahan, LLC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Sachetta & Callahan, LLC will refund any unearned portion of the advance payment.

Sachetta & Callahan, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Sachetta & Callahan, LLC will refund any unearned portion of the advance payment.

Fees and Compensation

Description

Sachetta & Callahan, LLC bases its fees on a percentage of assets under management, hourly charges, and fixed fees. Insurance and annuity products are sold and generate a commission.

Financial plans are priced according to the degree of complexity associated with the client's situation, with a minimum fee of \$3,500.

Simplify XY program requires a minimum account size of \$5,000 and a minimum annual fee of \$25.

Fees are not negotiable.

Fee Billing

Investment management fees are billed either monthly or quarterly, in arrears, meaning that we invoice you *after* the monthly billing period has ended. Fees are based on the *average* account balance during the preceding month or quarter. Fees are deducted from a designated client account to facilitate billing.

Fees for financial plans are billed upon completion, with the balance due upon delivery of the financial plan.

Other Fees

Custodians and/or brokers may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Sachetta & Callahan, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Sachetta & Callahan, LLC, but Sachetta & Callahan, LLC receives no portion of the mutual fund expense ratio.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Sachetta & Callahan, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

Sachetta & Callahan, LLC generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

While we do not have a minimum account size, our minimum annual fee is \$3,500. At our 1% annual AUM fee, this is equal to the annual fee on a \$350,000 portfolio. Clients with less than \$350,000 would pay the minimum annual fee of \$3,500, which would represent a higher percentage of their assets.

Depending upon circumstances, Sachetta & Callahan, LLC will sign an *Hourly Agreement* with the client if assets have diminished significantly below \$350,000.

Sachetta & Callahan, LLC has the discretion to waive the account minimum. Exceptions may apply to employees of Sachetta & Callahan, LLC and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

Fundamental Analysis: Fundamental analysis of a business involves analyzing its income statement, financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis school of thought maintains that markets may mis-price a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mis-priced security and then waiting for the market to recognize its "mistake" and re-price the security.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Therefore, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

Technical Analysis: Technical analysis seeks to identify price patterns and trends in financial markets and attempt to exploit those patterns. We follow and examine such indicators as price, volume, moving averages of the price and market sentiment. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Sachetta & Callahan, LLC may use include Morningstar Office mutual fund information, Morningstar Office stock information, Fidelity Investments research information, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. This means that we use mutual funds and exchange traded funds to develop a well-diversified portfolio. Portfolios are globally diversified to control the risk associated with traditional markets. Diversification may be adjusted periodically depending on the investment markets, or the client's financial situation and risk tolerance.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Asset Allocation: Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual fund and/or ETF analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated

investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable of the client's portfolio.

Long-term purchases: We purchase securities with the idea of holding them in the clients account for a year or longer. We may do this because we believe the securities to be currently undervalued. We may do this because we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases: We purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A risk in a short-term purchase strategy is that, should the anticipated price swing not materialize, we are left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Automated Investment Program Risk: An investment adviser that uses algorithmic and other technology-based programs to provide clients with discretionary asset management services is typically offering an investment program with limited human interaction through an online, electronic-based delivery model. In contrast to traditional advisory relationships where investment adviser personnel typically interact with clients to form a basis for the investment advice given, automated investment programs and platforms rely on other techniques such as online questionnaires to gather client information in order to make suitability determinations for their clients. Limited human interaction between investment advisory personnel and clients presents unique challenges and risks. If there is no human interaction involved in an automated investment program, there is no opportunity to explain the context for the questions asked, to ask follow-up questions about a client's responses, to provide assistance to clients completing the questionnaire or to address inconsistencies in client responses. Moreover, an adviser may have limited information and transparency on the algorithms designed and maintained by third-party program sponsors or participants. Even small changes to the algorithms used may cause significant changes to a client investment account.

Consequently, automated investment programs should only be used by individuals not requiring sophisticated modeling or frequent personal interactions with advisory personnel and those comfortable with the technological aspects of a particular investment platform.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Activities

Sachetta & Callahan, LLC also provides income tax preparation services to individuals and small businesses. Clients who elect to engage us for those services outside of a Wealth Management relationship pay a separate fee solely for those services.

Certain employees of Sachetta & Callahan, LLC are registered as insurance agents. In these capacities, they may recommend insurance products and receive normal insurance transactions commissions if insurance products are purchased through these registered individuals.

If and where applicable, our firm's advisory fees may be waived or reduced by the amount of commissions, markups, or 12b-1 distribution fees, or any other associated additional compensation received by these individuals or the firm itself.

Since we endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser and take the following steps to address these conflicts:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn compensation from advisory clients in addition to our advisory fees;
- We disclose to clients that they are not obligated to purchase any additional services from our firm or its employees;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;

- Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm;
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

Affiliations

Sachetta & Callahan, LLC has arrangements that are material to its advisory business.

Joseph Sachetta is on the Board of Directors at the Everett Co-Operative Bank.

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

Code of Ethics

The employees of Sachetta & Callahan, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Sachetta & Callahan, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Sachetta & Callahan, LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of Sachetta & Callahan, LLC is Michael J. Callahan. He/she reviews all employee trades each quarter. His/her trades are reviewed by Joseph Sachetta. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

We do not request or accept the discretionary authority to determine the broker dealer to be used for client accounts. This means that we will not survey or shop the brokerage market place for best execution on a transaction-by-transaction basis. As such, clients must direct us as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that we will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients. *Not all advisers require their clients to direct brokerage.*

For clients in need of brokerage or custodial services, and depending on client circumstances and needs, we will recommend the use of Fidelity Brokerage Services LLC (hereinafter, "Fidelity"), member NYSE/SIPC, provided that such recommendation is consistent with our fiduciary duty to the client. Our clients must evaluate Fidelity before opening an account. The factors considered by our firm when making this recommendation are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, and the custodial platform provided to clients, among other factors.

Clients are not under any obligation to effect trades through any recommended broker.

All transactions in accounts invested in Simplify XY must be made through Fidelity and consequently, in electing to participate in Simplify XY, a client directs our firm to select Fidelity and/or its affiliate as the exclusive executing broker dealer.

If a client, when undertaking an advisory relationship with our firm, already has a pre-established relationship with a broker and instructs us to execute all transactions through that broker, it should be understood that under those circumstances, we will not have the authority to negotiate commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients since our firm may not be able to aggregate orders to reduce transaction costs or the client may

receive less favorable prices.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker if we believe that this choice would hinder its fiduciary duty to the client and/or its ability to service the account.

Soft Dollar Practices

We have not entered into any formal soft-dollar arrangements.

Fidelity may provide research information in expectation of future business. Custodians may provide discounted software or discounted subscriptions with the expectation of future business

Fidelity may send compliance newsletters and other publications that are very helpful in maintaining an up-to-date compliance program. The Company does not pay for these publications.

Fidelity provides web-based software to access client accounts and to upload advisory fee invoices for direct debit. The Company does not pay for this capability.

Fidelity holds periodic conferences offering education on current topics relevant in the investment and financial planning world. The Company may attend these conferences from time to time at no cost.

Exhibitors at conferences pay a significant amount of money to exhibit. Exhibitor fees reduce the attendee fees that the Company advisers have to pay to attend the conferences. As a means of thanking exhibitors for their support, the Company advisers visit the exhibitors' booths.

Consequently, participation in the Fidelity Institutional Wealth Services Program may result in a potential conflict of interest for our firm, as the receipt of the above benefits creates an incentive for us to use Fidelity for the execution of client trades.

Nonetheless, we have reviewed the services of Fidelity (and its affiliates) and recommend the services based on a number of factors. These factors include the professional services offered, commission rates, and the custodial platform provided to clients. We may periodically attempt to negotiate lower commission rates for our clients with Fidelity.

Should we decide to use another broker dealer to execute a client trade due to better availability, liquidity, or pricing, Fidelity may charge an additional trade-away fee for each such trade. Therefore, we will only use this trade-away ability in situations with compelling financial reasons.

Client Referrals

Sachetta & Callahan, LLC does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed periodically, typically quarterly, by our Investment Committee. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic investment performance communications on at least a quarterly basis.

Simplify XY

An investor profile questionnaire is required so that Simplify XY can map a client real time to a portfolio based on his/her advisor's allocations. Our firm has the opportunity to select a different portfolio for a client prior to it being invested if our firm feels it is appropriate. Every Simplify XY portfolio has a target asset allocation—a combination of equity, fixed income, commodities, and cash determined by an investor's stated goals, risk tolerance, and time horizon in the initial questionnaire. Over time, however, contributions/withdrawals, gains, and losses cause a client portfolio to stray from the original target, and it can become unbalanced. The solution is rebalancing, the act of periodically buying or selling assets to restore your portfolio to its target allocations. Simplify XY rebalances automatically, thanks to an algorithm that adjusts a client account when an asset class shifts a

certain amount above or below its target range. Monitoring and trading of an Simplify XY portfolio is typically limited to such rebalancing.

Client Referrals and Other Compensation

Incoming Referrals

Sachetta & Callahan, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Sachetta & Callahan, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

Account Statements

Custody is defined as any legal or actual ability by our firm to access client funds or securities. Since all client funds and securities are maintained with a qualified custodian, we don't take physical possession of client assets. However, under the current SEC rules, our firm is deemed to have constructive custody of certain client assets. Therefore, we urge all of our management clients to carefully review and compare their quarterly reviews of account holdings and/or performance results received from us to those they receive from their custodian. Should you notice any discrepancies, please notify us and/or your custodian as soon as possible.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Sachetta & Callahan, LLC.

Investment Discretion

Discretionary Authority for Trading

Sachetta & Callahan, LLC accepts discretionary authority to manage securities accounts on behalf of clients. Sachetta & Callahan, LLC has the

authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used. Sachetta & Callahan, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment strategy that we have discussed with you.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

Sachetta & Callahan, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Sachetta & Callahan, LLC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Simplify XY uses a third-party vendor as the proxy voting agent.

Financial Information

Financial Condition

Sachetta & Callahan, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

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

Brochure Supplements

(Part 2B of Form ADV)

Education and Business Standards

Sachetta & Callahan, LLC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, CLU, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Certified Public Accountant (CPA): CPA is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA.

Personal Financial Specialist (PFS): The PFS credential was established for CPAs in the United States who specialize in personal financial planning. The credential is awarded exclusively to members of the American Institute of Certified Public Accountants (AICPA) who have demonstrated considerable experience and expertise in that area. As of today, the AICPA has granted approximately 3,300 CPA/PFS credentials. The PFS designation is available to CPAs, and is based on a points system, where a minimum of 100 points must be accrued.

Chartered Life Underwriter (CLU): CLUs must complete an educational program offered by The American College, pass 10 examinations covering

the application of life and health insurance in filling needs for survivor income, estate planning, business continuation and employee benefits. CLUs also met experience and ethical standards and achieves continuing education requirements of 15 hours yearly.

Joseph Sachetta, CFP®, CPA/PFS

Educational Background:

- Bentley College, Bachelor's Degree in Accountancy, 1980
 - Bentley College, MBA, 1983
 - Bentley College, Master's Degree in Taxation, 1987
-
- Date of birth: 2/25/1958

Business Experience:

- Sachetta & Callahan, LLC (f/k/a Sachetta & Company, LLC)
 - 1984 – Present
 - Partner
- Infinite Wealth Management, Inc.
 - 2007 – 2013
 - Principal
- Quest Financial Services, Inc.
 - 1998 – 2007
 - Principal

Disciplinary Information: None

Other Business Activities:

- Board of Directors, Everett Co-Operative Bank

Additional Compensation: Joseph Sachetta does not receive any additional compensation from third parties for providing investment advice to our clients.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Supervision: As the principals Sachetta & Callahan, LLC, Joseph Sachetta and Michael Callahan determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client,

documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. Both can be reached at (781) 233-4138

Michael J. Callahan, CPA, CFP®, MST (Master of Science in Taxation)

Educational Background:

- Merrimack College, Bachelor's Degree in Finance, 2003
- Bentley University, Master's Degree in Taxation, 2009

- Date of birth: 2/19/1981

Business Experience:

- Sachetta & Callahan, LLC (f/k/a Sachetta & Company, LLC)
 - o Partner, 2011 - Present
 - o Staff Accountant, 2003 - 2011
- Infinite Wealth Management, Inc.
 - o Principal
 - o 2007 – 2013
- Quest Financial Services, Inc.
 - o Financial Advisor
 - o 2002 - 2007

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: Michael Callahan does not receive any additional compensation from third parties for providing investment advice to our clients.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Supervision: As the principals Sachetta & Callahan, LLC, Joseph Sachetta and Michael Callahan determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material

investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. Both can be reached at (781) 233-4138

Andrew Reitano, CFP®, ChFC®, CLU®

Educational Background:

- UMass Boston, Bachelor's Degree in History, 1993

- Date of birth: 12/08/1970

Business Experience:

- Sachetta & Callahan, LLC
 - o Financial Advisor, 2015 - Present
- New York Life Insurance Company
 - o Insurance Planning, 2008 - 2015
- United States Air Force
 - o Public Affairs, 1993-2010
- Federal Reserve Bank – Boston
 - o Communications, 2000-2007

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: Andrew Reitano does not receive any additional compensation from third parties for providing investment advice to our clients.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Supervision: As the principals Sachetta & Callahan, LLC, Joseph Sachetta and Michael Callahan determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. Both can be reached at (781) 233-4138

Eric Sachetta

Educational Background:

- Bentley University, Bachelor's Degree in Corporate Finance & Accounting, 2010

- Date of birth: 12/06/1987

Business Experience:

- Sachetta & Callahan, LLC
 - o Advisor Assistant, 2016 - Present
- E TEAM INC
 - o Author, Speaker, Peak Performance Coach 2010 – 2016
- Vector Marketing/Cutco Cutlery
 - o District Manager, 2011-2013
 - o Pilot Manager, 2010-2011
 - o Sales Rep, 2008-2010

Disciplinary Information: None

Other Business Activities: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Supervision: As the principals Sachetta & Callahan, LLC, Joseph Sachetta and Michael Callahan determine the general business strategy of the firm and are ultimately responsible for all employee supervision. They also supervise our firm's formulation and monitoring of investment advice offered to client, documentation of investment meeting deliberations, oversight of all material investment policy changes, and conduct of periodic testing to ensure that client objectives and mandates are being met. Both can be reached at (781) 233-4138