

Athena Advisory Services Inc. Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Athena Advisory Services Inc.. If you have any questions about the contents of this brochure, please contact us at (248) 453-5252 or by email at: diane@theathenagrouponline.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 Athena Advisory Services Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Athena Advisory Services Inc.'s CRD number is: 284174.

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

Athena Advisory Services Inc. has the following material changes to report. This list summarizes changes to policies, practices or conflicts of interests only.

- Athena Advisory Services Inc. has updated Item 10A and 10C to remove Royal Alliance.
- Athena Advisory Services Inc. may refer clients to third party advisors. Item 4, 5, 8, and 10.
- Athena Advisory Services Inc. has updated Item 4 to remove reference to limited types of investments.
- Athena Advisory Services Inc. has updated Item 12 to disclose TIAA/Cref as an additional custodian.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Athena Advisory Services Inc. (hereinafter "AASI") is a Corporation. The firm was formed in April 2016, and the principal owner is Diane Lynn Young.

B. Types of Advisory Services

Portfolio Management Services

AASI offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AASI creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

AASI evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

AASI seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of AASI's economic, investment or other financial interests. To meet its fiduciary obligations, AASI attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, AASI's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is AASI's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Selection of Other Advisers

AASI may direct clients to third-party investment advisers. Before selecting other advisers for clients, AASI will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where AASI is recommending the adviser to clients.

C. Client Tailored Services and Client Imposed Restrictions

AASI will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by AASI on behalf of the client. AASI uses several different types of risk analysis tools to help assess clients risk tolerance as well as personally discussing risk with clients. AASI may use "model portfolios" together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent AASI from properly servicing the client account, or if the restrictions would require AASI to deviate from its standard suite of services, AASI reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. AASI does not participate in any wrap fee programs.

E. Assets Under Management

AASI has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$34,126,300.00	July 2017

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$0 - \$100,000	2.00%
\$100,001 - \$250,000	1.50%
\$250,001 - \$1,000,000	1.25%
\$1,000,001 - \$2,500,000	1.00%
\$2,500,001 – And Up	0.90%

The advisory fee is calculated using the value of the assets on the last business day of the prior billing period. This includes both taxable (e.g. traditional brokerage) and tax preferred (e.g. 403b and 401k) accounts.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of AASI's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between \$250 and \$10,000.

Hourly Fees

The negotiated hourly fee for these services is between \$125 and \$300.

AASI may direct clients to third-party investment advisers. AASI will receive its standard fee on top of the fee paid to the third party adviser. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

Selection of Other Advisers Fees

AASI may specifically direct clients to CLS, SEI, and Flexible Plan. The annual fee schedules are as follows:

CLS Autopilot

Total Assets	AASI's Fee	Third Party's Fee	Total Fee
0-100,000	1.0	0.25	1.25
100-250,000	.75	0.25	1.0
250-500,000	.75	0.25	1.0
500-750,000	.50	0.25	.75
750-1,000,000	.40	0.25	.65
1-2,000,000	.30	0.25	.55
2,000,000 Million Plus	.25	0.25	.50

SEI Advisors

Total Assets	AASI's Fee	Third Party's Fee	Total Fee
0-250,000	1.0		1.0
250,000-500,000	.90		.90
500,000-1,000,000	.75		.75
1 Million + .60	.60		.60

Flexible Plan

Total Assets	AASI's Fee	Third Party's Fee	Total Fee
250,000-500K	0.75	1.0	1.75
500-1 Million	0.50	0.75	1.25
1 Million Plus	0.50	0.50	1.0

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in advance.

Payment of Financial Planning Fees

Financial planning fees are paid via check.

Fixed financial planning fees are paid in arrears upon completion.

Hourly financial planning fees are paid in arrears upon completion.

Payment of Selection of Other Advisers Fees

Fees for Quarterly- Flex Plan are paid arrears. Fees for CLS and SEI are paid in advance.

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by AASI. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

AASI collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Diane Lynn Young is a registered representative of a broker-dealer and an insurance agent and in these roles, accepts compensation for the sale of investment products to AASI clients.

1. This is a Conflict of Interest

Supervised persons may accept compensation for the sale of investment products, including asset based sales charges or service fees from the sale of mutual funds to AASI's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, AASI will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase AASI recommended products through other brokers or agents that are not affiliated with AASI.

3. Commissions are not AASI's primary source of compensation for advisory services

Commissions are not AASI's primary source of compensation for advisory services.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

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

AASI does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

AASI generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of AASI's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

AASI's methods of analysis include Fundamental analysis or Modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

AASI uses selection of other advisers, long term trading, short term trading or margin transactions.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

AASI's use of margin transactions generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Selection of Other Advisers: Although AASI will seek to select only money managers who will invest clients' assets with the highest level of integrity, AASI's selection process cannot ensure that money managers will perform as desired and AASI will have no control over the day-to-day operations of any of its selected money managers. AASI would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

AASI's use of margin transactions generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither AASI nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AASI nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Diane Lynn Young is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AASI always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of AASI in connection with such individual's activities outside of AASI.

Diane Lynn Young is a public speaker on gender communications issues.

Diane Lynn Young is owner of The Athena Financial Group, Inc. This entity is used for the sale of life insurance products.

Diane Lynn Young is a board member for the Girl Scouts of Southeast Michigan.

Diane Lynn Young is President of the Women's Democratic Club of Greater Rochester. In this position she helps organize meetings monthly.

Diane Lynn Young is author of a book "Owning Your Financial Success".

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AASI may direct clients to third-party investment advisers. AASI will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that AASI has an incentive to direct clients to the third-party investment advisers that provide AASI with a larger fee split. AASI will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. AASI will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where AASI is recommending the adviser to clients.

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

A. Code of Ethics

AASI has a written Code of Ethics that covers the following areas: Participation or Interest in Client Transactions, Personal Trading, Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. AASI's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

AASI does not recommend that clients buy or sell any security in which a related person to AASI or AASI has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of AASI may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AASI to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AASI will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of AASI may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AASI to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, AASI will never engage in trading that operates to the client's disadvantage if representatives of AASI buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on AASI's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and AASI may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in AASI's research efforts. AASI will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

AASI will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC and TIAA/Cref .

1. Research and Other Soft-Dollar Benefits

While AASI has no formal soft dollars program in which soft dollars are used to pay for third party services, AASI may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). AASI may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and AASI does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. AASI benefits by not having to produce or pay for the research, products or services, and AASI will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that AASI's acceptance of soft dollar benefits may result in higher commissions charged to the client.

AASI participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. AASI receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, AASI participates in TD Ameritrade's institutional advisor program and AASI may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between AASI's participation in the Program and the investment advice it gives to its clients, although AASI receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving AASI participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have AASI's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to AASI by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by AASI's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit AASI but may not benefit its client accounts. These products or services may assist AASI in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help AASI manage and further develop its business enterprise. The benefits received by AASI or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, AASI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by AASI or its related persons in and of itself creates a conflict of interest and may indirectly influence the AASI's choice of TD Ameritrade for custody and brokerage services.

2. Brokerage for Client Referrals

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

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

AASI will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If AASI buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, AASI would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. AASI would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for AASI's advisory services provided on an ongoing basis are reviewed at least quarterly by Diane L Young, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at AASI are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Diane L Young, President. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, AASI's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of AASI's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. AASI will also provide at least quarterly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits discussed in Item 12 above, AASI does not receive any economic benefit directly or indirectly from any third party for advice rendered to its clients. There is no direct link between AASI's participation in the TD Ameritrade Program and the investment advice it gives to its clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

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

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, AASI will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

AASI does not have discretion over client accounts at any time.

Item 17: Voting Client Securities (Proxy Voting)

AASI will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

AASI neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AASI nor its management has any financial condition that is likely to reasonably impair AASI's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

AASI has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

AASI currently has only one management person: Diane Lynn Young. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

AASI does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.