

Part 2A of Form ADV: Firm Brochure

Item 1 – Cover Page

PRISM FUND SOLUTIONS, INC.

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www.prismfundsolutions.com

March 29, 2024

This Brochure provides information about the qualifications and business practices of Prism Fund Solutions, Inc. (“Prism”). If you have any questions about the contents of this Brochure, please contact us at (727)-580-6006. 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.

Prism is a registered investment adviser. Registration of an Investment Adviser does not imply any certain level of skill or training. The purpose of this form is to provide you with information you may use to determine to hire or retain an adviser.

Additional information about Prism also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Prism is 124651. The SEC’s web site also provides information about any persons affiliated with Prism who are registered, or are required to be registered, as investment adviser representatives of Prism.

Item 2 – Material Changes

This Item of the Brochure will discuss only specific material changes that are made to the Brochure and will provide clients with a summary of such material changes. The last update to the Brochure was March 13, 2023.

The only material change to Prism Fund Solutions, Inc. since the last update is that our custodians for client accounts are now primarily Charles Schwab & Co., Inc., Ascensus Broker Dealer Services, LLC (via The Newport Trust Co.), LPL Financial LLC (via The Bank of Tampa), and ADP Broker-Dealer, Inc. (via the ADP Trust).

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to the SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year, and we will also deliver without charge, a copy of its Form ADV Part 2 to you upon your written request.

We may further provide other ongoing disclosure information about material changes as necessary, and we will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Dan G. Edwards, President at (727)-580-6006.

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Item 4 – Advisory Business

Prism Fund Solutions, Inc. has been providing investment advisory services since September 2002. We provide these services primarily to individual, pre-tax and after-tax accounts, high-income individual clients, trusts, and plan sponsor and executive retirement plans.

As of December 31, 2023, Prism managed approximately \$2,756,502 on a discretionary basis and approximately \$32,858,824 on a non-discretionary basis.

Principal Owners

Dan G. Edwards is the President and owner of Prism Fund Solutions, Inc.

Types of Advisory Services

Portfolio Management Services

Prism provides discretionary or non-discretionary portfolio management services where the investment advice provided is custom-tailored to meet the needs and investment objectives of the client. Once the portfolio is constructed, Prism provides regular supervision and re-optimization of the portfolio as changes in market conditions and client circumstances may require.

Qualified Plan Consulting Services

Prism will provide qualified plan (ERISA) consulting services to employee benefit plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include an existing plan review, formation of the investment policy statement, asset allocation advice, money management services, investment performance monitoring, ongoing consulting, and/or communication and education services where Prism will assist the plan sponsor in providing meaningful information regarding the retirement plan to its participants.

Advisory services for individually-managed accounts

Our focus is on value investing and our horizon is long-term, with minimal fees. We conduct our research via a variety of sources and methods. These may include:

- financial newspapers and magazines
- research materials prepared by others
- corporate rating services
- inspections of corporate activities

- annual reports, prospectuses, and filings with the Securities and Exchange Commission
- company press releases

For our investment management, we primarily use various types of equity securities, corporate, government, and municipal bonds, no-load mutual funds, and exchange-traded funds (ETFs).

We tailor client portfolios to the client's individual needs. We meet with and speak to the client regularly to determine whether there has been any significant change in the client's circumstances and financial needs. This way, we can monitor whether the client's account continues to conform to the client's investment objectives and requirements. We attempt to accommodate any investment restrictions that have been made known to us by clients (for example: an aversion to tobacco or casino companies).

Item 5 – Fees and Compensation

Portfolio Management Services

The annual fee for portfolio management services is billed quarterly in arrears, is due on the fifteenth day of the calendar quarter, and is either fixed, as described in the advisory contract, or based on the account's asset market value on the last business day of the prior calendar quarter. Fees are prorated for accounts opened during the quarter.

Percentage fees for discretionary portfolio management services are negotiable and generally begin at .5% per year of the assets under management. Fees are not allowed to exceed 1.5% annually, and fees are typically based on the amount of assets under management and the range of services being provided.

Prism will invoice the client directly, and all fees are paid directly by the client. Prism may not directly deduct fees from any account for which it has assets under management. Clients may choose to deduct invoiced fees from plan assets or pay invoiced fees directly. Additionally, the qualified custodian of the account agrees to deliver confirmations of all securities transactions and a quarterly account statement directly to the client, which shows all disbursements from the account. We encourage the client to review all account statements for accuracy, including comparing any custodian statements with any Prism reports. Prism will receive a duplicate copy of the statement that was delivered to the client.

Since fees typically are payable after services are provided, there are no unearned fees and the client is not due a refund upon early termination of an investment advisory contract. However, Prism's fees are prorated to the date of termination.

Also, if the client does pay the fees in advance, the client may obtain a refund of the advance fee, minus \$250, if the services agreement is terminated prior to the end of the billing period. Such a refund will be determined as a ratio of the number of elapsed days in the month, divided by the actual days within the month of termination.

DISCRETIONARY CLIENT FEE OPTIONS/SCHEDULE:

All discretionary clients pay a \$250 non-refundable fee upon client engagement.

Discretionary clients may choose any one of the following fee options:

Option 1: Flat fee of a pre-determined rate or dollar amount per year, as mutually agreed upon between the client and advisor in advance.

Option 2: Discretionary account fees are based upon a client's total market value of account assets at the end of the prior quarter and may range between 0.25% (25 basis points) to 1.00% (100 basis points) annually, which is a quarterly % of 0.0625% to 0.25%.

Non-discretionary fees are negotiable and generally based upon the market value of qualified plan assets at the end of the prior quarter. All fees are payable in arrears. Non-discretionary account fees are charged either a flat fee or a percentage of assets under management (AUM), ranging between 0 to 50 basis points (0.00% to 0.50%) annually, as agreed in advance.

*All fees are negotiable.

** At Prism's discretion, Prism may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee. Prism may allow such aggregation, for example, where Prism services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and other types of related accounts. This consolidation practice is designed to allow client(s) the benefit of an increased asset total, which could potentially cause the account(s) to be assessed a reduced advisory fee based on the breakpoints available in Prism's fee schedule as stated above.

Qualified Plan Consulting Services

Prism primarily provides Qualified Plan Consulting Services to their qualified plan clients at a negotiated flat fee or as a percentage of assets under management, as detailed on the advisory agreement.

All Qualified Plan Consulting accounts are regulated under the Employee Retirement Income Securities Act ("ERISA"). Prism will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision as to retaining the

services of such investment managers as Prism recommends. The plan fiduciary is free to seek independent advice about the appropriateness of any recommended services for the plan.

GENERAL INFORMATION ON ADVISORY SERVICES AND FEES

The fee charged is calculated on a case-by-case basis with each client and is not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds or any portion of the funds of an advisory client (SEC Rule 205(a)(1)).

Accounts initiated or terminated during a calendar quarter will be charged on a prorated basis and, upon termination earned, unpaid fees, if any, will then be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. Also, per the Prism client agreement, Prism clients may terminate an advisory agreement at any time.

Advice offered by Prism may involve investment in mutual funds, exchange-traded funds, or equity securities. All fees paid to Prism for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, brokerage commissions, transaction charges, and other related costs and expenses are involved with the purchasing or selling of securities and are incurred by clients.

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Prism does not share in any portion of the brokerage fees or transaction charges imposed by the custodian holding the client's funds or securities. The client should review all fees charged by mutual funds, Prism, and others to understand the total amount of fees to be paid by the client.

Please see Item 12 and Item 14 which further describe the factors that Prism considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation.

Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with Prism. Account fees and transactions charges may be higher or lower at Charles Schwab & Co., Inc. ("Charles Schwab"), Ascensus Broker Dealer Services, LLC ("Ascensus"), LPL Financial LLC ("LPL"), and ADP Broker-Dealer, Inc. ("ADP") than at other broker/dealers offering similar services.

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

Prism does not charge any performance-based fees (fees based on a share of capital gain on or capital appreciation of the assets of a client), side-by-side with its standard asset-based or fixed fee compensation. All discretionary account fees are calculated as described in **Item 5** and are not charged on the basis of income or capital gains or capital appreciation of the client's account.

Item 7 – Types of Clients

Prism offers personalized investment advisory services to individuals, high net worth individuals, trusts, and plan sponsor retirement plans.

Prism generally imposes a minimum of \$100,000 to open and maintain an advisory account. However, this account minimum may be waived at the discretion of Prism if, for example, the client appears to have significant potential for increasing assets under management. Prism generally will allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account requirement.

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

Prism's investment approach is rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. Prism recommends diversified portfolios, principally through the use of a blended strategic and tactical management style. Prism selects or recommends to clients' portfolios of individual securities, broadly-traded open-end mutual funds, open/closed-end ETFs, or fixed income securities to implement this investment strategy.

Although all investments involve risk, Prism seeks to mitigate risk through broad diversification among asset classes. Prism utilizes a broad range of investment vehicles to diversify client portfolios. Prism designs portfolio strategies tailored to the needs of each investor. However, frequent trading of securities increases brokerage and other transaction costs that Prism's strategy seeks to minimize.

Prism's strategies do not utilize securities that we believe would be classified as having unusual risks. Dependent upon market conditions, frequent trading may be deemed necessary. Prism does not utilize a private fund strategy as part of its core portfolio management services. Therefore, in the implementation of investment plans, Prism uses individual securities, mutual funds, and ETFs.

Clients may hold or retain other types of assets as well, and Prism may offer advice regarding those various assets as part of its services. Advice regarding such assets may generally involve asset management services, and may help to more generally assist the client.

Analysis of a Client's Financial Situation

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, Prism relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. For discretionary, non-qualified accounts, Prism may use a Dynamic Asset Allocation strategy, an approach for dealing with uncertainty to derive a recommended asset allocation or portfolio.

In a Dynamic Asset Allocation strategy, the Advisor/client may continually and frequently adjust the mix of portfolio assets as markets rise and fall, as the economy or markets strengthen or weaken. This type of portfolio may, from time to time or at any time, or in any combination, consist of positive, inverse, or leveraged correlated investments.

Within a Dynamic Asset Allocation strategy, the client may sell assets that are declining and purchase assets that are increasing, making the Dynamic Asset Allocation strategy the polar opposite of a constant-weighting strategy. For example, if the financial markets show weakness, to sell investments in anticipation of further decreases; if the financial markets seem to be strengthening, to purchase investments in anticipation of continued market gains.

For non-discretionary qualified plan accounts, Prism typically uses a Strategic Asset Allocation model, which focuses on a buy and hold approach.

As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those being used.
- The risk that future rates of return will fall short of estimates.
- The risk that inflation will exceed the estimates.
- For taxable clients, the risk that tax rates could be higher than expected.

We base our investment recommendations on the client's financial situation at the time and on financial information disclosed to us by the client.

When preparing these recommendations, we make certain assumptions regarding interest and inflation rates, as well as regarding past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. We cannot, and do not,

offer any guarantees or promises that the client's financial goals and objectives will be met. Further, the client must continue to review any recommendations, and update the investment plan based upon changes in the client's financial situation, goals or objectives or changes in the economy. Should the client's financial situation, goals, objectives or needs change, the client must notify Prism promptly of the changes.

Risk of Loss

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

All investments present the risk of loss of principal—the risk that the value of securities (mutual funds, ETFs and individual stocks/bonds), when sold or otherwise disposed, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by Prism may include funds invested in domestic and international equities, including open end real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization, and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to interest rate, inflation, and credit risks.

Among the riskiest mutual funds used in Prism's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, and most bonds present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by Prism may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

More information about the risks of any particular market sector can be reviewed in representative fund prospectuses managing assets within each applicable sector.

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 Prism or the integrity of Prism's management. Prism does not have any disciplinary information to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Representatives of Prism do not have any other financial industry activities and affiliations. However, as part of a client’s financial analysis, Prism may refer clients to outside representatives who typically sell insurance products, or provide legal and/or accounting services. Clients may or may not choose to purchase financial products or services offered through or by these representatives. Prism does not receive any compensation for any client referral purchase of any financial product.

Prism notes that there may be other suitable securities and investment products available through other broker-dealers.

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

Prism, or individuals associated with Prism, may buy or sell, for their personal account(s), investment products identical to those recommended to clients. It is the expressed policy of Prism that no person employed by Prism may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, therefore preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations may represent a conflict of interest, Prism has established the following restrictions in order to ensure its fiduciary responsibilities:

- Prism emphasizes the unrestricted right of the client to specify investment objectives, guidelines, and/or conditions on the overall management of their account.
- Associated persons or their immediate family members shall not buy or sell securities for their personal portfolio(s) where their decision is derived in whole or in part, by reason of the associated person’s employment, unless the information is also available to the investing public on reasonable inquiry. No associated person of Prism shall prefer his or her own interest to that of the advisory client.
- Prism and its employees may not participate in private placements or initial public offerings (IPOs) without pre-clearance from Prism's Compliance Officer.
- Prism requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

- Records will be maintained of all securities bought or sold by Prism, associated persons of Prism, and related entities. Dan Edwards will review these records on a regular basis.
- Any individual not in observance of the above may be subject to termination.

Further, Prism has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Prism's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth Prism's practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with Prism may buy or sell securities for their personal accounts that are identical or different than those recommended to clients. It is the expressed policy of Prism that no person employed by Prism shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

Prism's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information. Prism requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

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 Employment Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. 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 interests 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 what is reasonable for our services; and
- * Give you basic information about conflicts of interest.

Prism will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Item 12 – Brokerage Practices

For Prism portfolio management clients in need of brokerage or custodial services in conjunction with Prism advisory services, and depending on client circumstances and needs, Prism may recommend the use of Charles Schwab, Ascensus, LPL, and ADP. We have evaluated these custodians and believe that they will provide our clients with an appropriate blend of execution services, commission costs and professionalism.

How We Select Brokers and Custodians to Recommend

We seek to select a custodian/broker who will hold our clients' assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for the custody)
- Capability to execute, clear, and settle trades (buy and sell securities for the client's account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below

We generally trade through the directed custodian/broker regardless of whether a client has an active prime brokerage agreement in place allowing us to use outside brokers. As a result, it should be understood that we will likely not negotiate commissions or obtain volume discounts beyond those already offered by the custodian/broker. We believe that, given the additional costs of using outside brokers along with our own custodians' resources and commitment to providing appropriate execution, we are fulfilling our obligation to seek best execution by trading directly through them. In

addition, we independently review the execution of the custodians on a periodic basis and also review their own internal documentation of their trading capabilities. Prism recommends that clients evaluate each custodian before opening an account.

Although clients may have selected a custodian/broker and we generally trade through their designated broker, we will not trade through the custodian/broker if we reasonably believe that it may result in a breach of our fiduciary duty. For example, we may use an outside broker for fixed income transactions if we think it is in the client's best interests and if the client has executed a prime brokerage agreement.

Please note that because we will be executing most, if not all, transactions through the directed custodian/broker, a disparity may exist between the commissions borne by the client's account and the commissions borne by our other clients that direct us to use another particular broker-dealer.

While we are comfortable with the custodians we utilize, you should note that some differences may exist based on the assets our clients maintain at each. You may forego benefits that we may be able to obtain for other clients through, for example, negotiating volume discounts or block trades if your assets are held at one of our smaller custodial relationships. This may occur if you are part of a smaller group at one custodian, while we have a larger number of clients at a different custodian.

Your Brokerage and Custody Costs

For our clients' accounts that the broker/custodian maintains, they generally do not charge the client separately for custody services but are compensated by charging the client commissions or other fees on trades that it executes or that settle into the client's account. In addition, the custodian/broker may charge the client a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into the client's custodial account. These fees are in addition to the commissions or other compensation the client pays the executing broker-dealer. Therefore, in order to minimize the client's trading costs, and due to the expected execution, we think our custodians provide, we execute most trades for the client's account through each custodian.

We have determined that having the client's custodian execute most trades is consistent with our duty to seek "best execution" of the client's trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Clients may request that brokerage transactions to be directed to a particular broker or dealer other than Charles Schwab, Ascensus, LPL, and ADP. However, if Prism believes that the use of that broker dealer would hinder Prism in meeting its fiduciary obligations, Prism will not be able to accept the account.

We may engage in "block trading" when advantageous to clients. This means that we may purchase a

large block of shares and then allocate those shares among the participating client accounts.

Regarding aggregated "block trades," we operate so that no advisory account will be favored over any other account participating in the aggregated order. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared based on their participation in the trade within the same group of clients at the same custodian.

Prism does not receive any compensation for products or services on a "soft dollar" basis.

Item 13 – Review of Accounts

Dan G. Edwards, President, will monitor client accounts on a regular basis. Each account will be formally reviewed at least annually by the IAR assigned to the account. Any material change in the client's financial circumstances will trigger an additional review of a client's account.

Such changes might include, but are not limited to, the following: changes in economic conditions, changes in the client's financial situation or investment objectives, and the client's request for an additional review of the account.

Dan G. Edwards, President, is responsible for the overall investment direction of Prism. Accounts are reviewed for asset allocation and holdings for each portfolio, taking into consideration the account's investment objectives, account restrictions and client directed trades/holdings.

Reports:

Reports are sent to clients on a quarterly basis or other such timeframe as the client may desire. The Monitoring Report provides an excellent portfolio/plan-level summary covering aspects such as diversification/asset allocation, style analysis, investment performance, expenses, the fi360 Fiduciary Score, investment commentary, and Watch List status.

The Investment Profile(s) report allows for an in-depth analysis and comparison of the investment to their peer group and index. Mutual Fund and ETF Profiles also include a historical page that is valuable for identifying trends in the fund's fi360 Fiduciary Score and other underlying criteria.

The Fee and Expense report provides a high-level cost overview while showing in a concise way the individual parties receiving these fees. The report then delves deeper into disclosing the various fee components and provides an analysis of each investment's fees compared to its peer group.

The 404(a)(5) Participant Fee Disclosure Report for Qualified Plans is intended to satisfy the 404(a)(5) requirement for investment disclosure to plan participants.

These reports are in addition to the monthly account statements and brokerage confirmations sent directly to the client by the custodian and broker.

Item 14 – Client Referrals and Other Compensation

Participation or Interest in Client Transactions

If the client account is managed on a discretionary basis, Prism determines the broker dealer to be used in each specific transaction with the objective of negotiating the best execution available.

While net price is a major consideration in best execution, Prism will also take into account the quality of brokerage services, confidentiality, financial stability, and responsiveness, among others.

Prism does not offer comprehensive financial planning, tax, or legal advice. However, we may receive referrals from, or provide referrals to, professionals in those areas.

Compensation to Solicitors

Prism does not receive nor offer compensation from such referrals, nor do we maintain referral arrangements (Solicitor's Agreements) with any non-employee, (outside) consultants, who may refer clients to Prism.

Additional Compensation

As also referenced in Item 12, Prism may recommend that clients establish brokerage accounts with Charles Schwab & Co, Inc. ("Charles Schwab"), Ascensus Broker Dealer Services, LLC ("Ascensus"), LPL Financial LLC ("LPL"), and ADP Broker-Dealer, Inc. ("ADP"), to maintain custody of clients' assets and to effect trades for their accounts.

Through Charles Schwab, Ascensus, LPL, and ADP Prism may access their institutional trading and operational services, which are typically not available to Charles Schwab, Ascensus, LPL, and ADP retail investors. Charles Schwab's, Ascensus's, LPL's, and ADP's services include research, brokerage, custody, access to mutual funds, and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Charles Schwab, Ascensus, LPL, and ADP may also make available to Prism other products and services that benefit Prism, but may not directly benefit its clients' accounts. Some of these products and services assist Prism in managing and administering clients' accounts. These include software and other technology that provide access to client account data, such as trade confirmations and account statements, facilitating trade execution, and allocation of aggregated trade orders from

multiple client accounts, and assisting with back-office support, such as recordkeeping and client reporting.

Many of these services generally may be used to service all, or a substantial number of Prism's accounts, including accounts not maintained at Charles Schwab, Ascensus, LPL, and ADP and may also provide Prism with other services intended to help Prism manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing.

In addition, Charles Schwab, Ascensus, LPL, and ADP may make available these types of services to Prism by independent third parties. Charles Schwab, Ascensus, LPL, and ADP may discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third party providing these services to Prism. The availability to Prism of the foregoing products and services is not contingent upon Prism committing to Charles Schwab, Ascensus, LPL, and ADP any specified amount of business, such as assets in custody or trading volume.

Item 15 – Custody

We do not have direct custody of client funds or securities, as they are maintained with a qualified custodian. We do not receive any client funds in any form, except as direct payments from the client for billed management fees.

Clients should receive at least quarterly statements from the qualified custodian that holds and maintains clients' investment assets. Prism urges clients to carefully review such statements and compare such official custodial records to the account reports that Prism may provide to clients. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients should notify the account custodian and us as soon as possible about any discrepancies they may detect.

Additionally, we do not request fees in excess of \$1,200 more than six months in advance of services rendered.

Item 16 – Investment Discretion

Portfolio Management Services

With respect to portfolio management services, clients may choose to grant Prism discretion over the selection and amount of securities to be bought or sold for their accounts, without obtaining their prior consent or approval, as described in their advisory agreements.

However, Prism's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry. Clients may amend these limitations as required and such amendments must be submitted in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Prism may vote proxies on behalf of clients' advisory accounts. At a client's request, we may offer them advice regarding corporate actions and the exercise of the client's proxy voting rights. If a client owns shares of common stock or mutual funds, they are responsible for exercising their right to vote as a shareholder unless the client has directly requested Prism to do so.

In most cases, clients will receive proxy materials directly from the account custodian, but clients will occasionally direct a custodian to send these materials to Prism on their behalf. Prism currently only votes proxies on behalf of one client.

Class Action Lawsuits

Prism has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. Additionally, Prism has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Lastly, Prism has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured because of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients or plans Prism may advise.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Prism's financial condition. Prism has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Prism's balance sheet is prepared on an accrual accounting basis in accordance with generally accepted accounting principles by an independent certified public accountant including notes on the principles used to prepare it, the basis of securities included, and any other explanations for clarity.

Item 19 – Requirements for State-Registered Advisers

The principal executive officer and management person of Prism is Dan G. Edwards, President. Please see the **Part 2B of Form ADV: Brochure Supplement** for additional information about the education and business background of the principal of Prism.

As stated in **Item 6 – Performance-Based Fees and Side-By-Side Management**, Prism does not charge performance-based fees. Additionally, no management persons of Prism have been found liable in any arbitration claims alleging damages, in excess of \$2,500 nor have been found liable in any civil, self-regulatory organization, or administrative proceeding.

Prism management persons do not have any other relationships or arrangements with any issuer of securities. There is no other applicable information about management persons of Prism to be reported here in **Item 19**.

Part 2B of Form ADV: Brochure Supplement

Item 1 – Cover Page

DAN G. EDWARDS
Prism Fund Solutions, Inc.
1679 Watermark Circle, N.E.
St. Petersburg, FL 33702
(727)-580-6006

March 29, 2024

This Brochure Supplement provides information about Dan G. Edwards that supplements Prism Fund Solutions, Inc.'s ("Prism's") Brochure. You should have received a copy of that Brochure. Please contact Dan G. Edwards if you did not receive Prism's Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Dan G. Edwards is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Dan G. Edwards
Year of Birth: 1945

Education:

- Concord College – B.S. Business Administration - 1967
- Accredited Investment Fiduciary – AIF®
- Certified Plan Fiduciary Adviser – CPFA™

Accredited Investment Fiduciary (AIF®):

The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

Certified Plan Fiduciary Advisor (CPFA™):

Offered through the National Association of Plan Advisors (“NAPA”), the CPFA Designation certifies that the recipient has demonstrated the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities. To receive the CPFA Designation, the individual must complete a training program and successfully pass a comprehensive, closed-book final examination under the supervision of a proctor. In order to maintain the CPFA Designation, the individual must accrue and report a minimum of twenty hours of continuing education every two years. Two of the twenty CE credits must be on ethics/professionalism topics.

Business Experience:

- Prism Fund Solutions, Inc., President, Founder, and Investment Adviser Representative, 4/2002 to Present.
- Waterford Investor Services, Sales Representative, 4/2006 – 10/2006
- ING Financial Partners, Inc., Sales Representative, 1/2004 – 2/2006

Item 3- 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 each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

The following describes Dan G. Edward's engagements in investment related businesses.

See the **Form ADV Part 2A – Firm Brochure** for additional details.

Dan G. Edward's principal business activities, and the approximate amount of his time allotted to each is as follows:

- Giving investment advice and investment management – 100%

Item 5- Additional Compensation

This section does not apply.

Item 6 - Supervision

As the President, sole owner, and only advisor of Prism, Dan G. Edwards is responsible for all state and other regulatory compliance requirements and general business strategy of the firm. He also formulates and monitors the investment advice the firm offers to clients, oversees all material investment policy changes, and reviews client accounts to ensure that objectives and mandates are being met. Mr. Edwards can be reached at (727)-580-6006.

Item 7 – Requirements for State-Registered Advisers

State registered advisers are required to disclose all material facts regarding certain arbitration events, proceedings, or bankruptcy petitions. No information is applicable to this Item for Dan G. Edwards or Prism.