FORM ADV PART 2A
DISCLOSURE BROCHURE

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This brochure provides information about the qualifications and business practices of Proactive Financial Solutions 360, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (508) 316-9360. 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 Proactive Financial Solutions 360, LLC (CRD #304440) is available on the SEC's website at www.adviserinfo.sec.gov

APRIL 4, 2024

Item 2: Material Changes

Annual Update

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

Material Changes Since the Last Update

Since the last update on March 27, 2024, the following changes have occurred:

- Item 4 assets under management updated.
- Item 5 Assets under management fees updated.

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 4: Advisory Business

Firm Description

Proactive Financial Solutions 360, LLC ("PFS 360") was founded in April 2019 and became a registered investment advisor in June 2019. Christopher Gauthier is 100% owner.

Types of Advisory Services

ASSET MANAGEMENT

PFS 360 offers discretionary asset management services to advisory Clients. PFS 360 will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize PFS 360 discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, PFS 360 may hire Sub-Advisors to manage all or a portion of the assets in the Client account. PFS 360 has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and PFS 360. Sub-Advisors execute trades on behalf of PFS 360 in Client accounts. PFS 360 will be responsible for the overall direct relationship with the Client. PFS 360 retains the authority to terminate the Sub-Advisor relationship at PFS 360's discretion.

ERISA PLAN SERVICES

PFS 360 provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. PFS 360 may act as a 3(21) advisor:

Limited Scope ERISA 3(21) Fiduciary. PFS 360 may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor PFS 360 has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using PFS 360 can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

    - Provide investment advice to the Client about asset classes and investment options available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. PFS 360 acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
    - Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
    - Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment option for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client

retains the sole responsibility of providing all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.

- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment options available to them under the Plan. Client understands PFS 360's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, PFS 360 is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. PFS 360 will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

PFS 360 may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between PFS 360 and Client.

3. PFS 360 has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to PFS 360 on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

<u>FINANCIAL PLANNING AND CONSULTING</u>
PFS 360 offers two different financial planning services as outlined below.

Comprehensive Financial Plans
Our comprehensive financial planning service involves a thorough assessment of your current financial status and future financial objectives. Utilizing a meticulous analysis of present net worth, tax obligations, asset distribution, and forthcoming retirement and estate plans, we develop customized financial strategies to help you achieve your goals.

Key elements covered in our comprehensive financial plans include:

- Setting clear and quantifiable financial goals, such as funding education, purchasing property, launching a business, retiring comfortably, or leaving a legacy.
- Establishing a personal net worth statement to gauge progress towards financial objectives.
- Creating a cash flow analysis to optimize debt repayment, savings, and investments.
- Crafting a retirement strategy tailored to your specific needs and aspirations.
- Developing a comprehensive risk management plan to safeguard against financial loss through insurance coverage.
- Designing a long-term investment plan aligned with your investment objectives and risk tolerance.
- Implementing tax reduction strategies to minimize tax liabilities.
- Providing guidance on estate preservation, including beneficiary reviews and updates to estate planning documents.
- All of these modules will be included as apply to household circumstances:
    - o Cash flow management strategies
    - o Debt management strategies
    - o Investment portfolio review and optimization
    - o Education funding planning
    - o Retirement income planning
    - o Tax planning for specific events or transactions
    - o Insurance needs analysis
    - o Estate planning guidance for specific situations
    - o Financial implications of life events such as marriage, divorce, or inheritance

Situational-Based Financial Plans

Our situation-based financial planning service is designed for clients seeking assistance with specific financial scenarios or concerns. Our situational planning will cover up to two of the modules listed below. While not a substitute for a comprehensive financial review, this option allows clients to address individual financial situations or explore particular areas of interest.

Clients can select from a range of situation-based topics (up to 2), such as:

- o Cash flow management strategies.
- o Debt management strategies
- o Investment portfolio review and optimization
- o Education funding planning
- o Retirement income planning
- o Tax planning for specific events or transactions.
- o Insurance needs analysis
- o Estate planning guidance for specific situations
- o Financial implications of life events such as marriage, divorce, or inheritance

We prioritize transparency and client empowerment in our approach. If a conflict of interest arises, clients are under no obligation to act upon our recommendations or transact through our firm.

Financial plans are typically completed and delivered within ninety (90) days, contingent upon the timely submission of all required documentation.

For further details or to discuss your financial planning needs, please contact us to arrange a consultation.

If a conflict of interest exists between the interests of PFS 360 and the interests of the Client, the Client is under no obligation to act upon PFS 360's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through PFS 360. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

PFS 360 does not sponsor any wrap fee programs.

Client Assets Under Management

PFS 360 has the following Client assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$12,580,000	$0	April 3, 2024

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

PFS 360 offers discretionary direct asset management services to advisory Clients. PFS 360 charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee
First $500,000	1.25%
Next $250,000	1.10%
Next $250,000	0.80%
Next $1,000,000	0.50%
Over $2,000,000+	0.30%

This is a tiered/blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. PFS 360 may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

For example (based on annual calculation):

Client with $750,000 under management would pay $9,000 on an annual basis.

AUM	Annual Fee	Total
First $500,000	x 1.25% =	$6,250
Next $250,000	x 1.10% =	$2,750
Annual Total		$9,000

The annual fee is negotiable. Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After five (5) business days, the Client may cancel by providing written notice to PFS 360 and PFS 360 may terminate advisory services with thirty (30) days written notice to the Client. For accounts opened or closed mid-billing period, fees will be prorated based on the day's services are provided during the given period. All unpaid earned fees will be due to PFS 360. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

PFS 360 may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. PFS 360 will enter into Sub-Advisor agreements with other registered investment advisor firms. When using Sub-Advisors, the Client may pay an additional fee of no more than 0.15% per year dependent upon the sub-advisor being utilized.

<u>ERISA PLAN SERVICES</u>

The annual fees are based on the market value of the Included Assets and will not exceed .50%. The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, PFS 360 shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of PFS 360 for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. PFS 360 does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, PFS 360 will disclose this compensation, the services rendered, and the payer of compensation. PFS 360 will offset the compensation against the fees agreed upon under the Agreement.

<u>FINANCIAL PLANNING</u>

Prior to the planning process the Client will be provided an estimated plan fee.

> <u>COMPREHENSIVE FINANCIAL PLANS</u>
>
> Comprehensive Financial plans are offered based on a negotiable fixed fee that ranges from $5,000 to $20,000 dependent upon the complexity of the Client's specific situation.
>
> <u>SITUATIONAL-BASED FINANCIAL PLANS</u>
>
> Situational-based financial plans are offered based on a negotiable fixed fee that ranges from $2,500 to $7,500 dependent upon the complexity of the Client's specific situation.

Fees for these financial plans may be paid in the following manners:

- Billed 50% in advance with the balance due upon plan delivery.

- Due upon commencement of the Financial Planning Agreement.

Services are completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation.

Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days any unpaid earned fees will be due to PFS 360. PFS 360 reserves the right to waive the fee should the Client implement the plan through PFS 360.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA services will either be deducted from Plan assets or paid directly to PFS 360. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to PFS 360.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. PFS 360 does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to PFS 360. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

PFS 360 does not require any prepayment of fees of more than $500 per Client and six months or more in advance.

Fees for ERISA 3(21) and/or 3(38) services may be billed in advance.

Fees for financial plans may be billed in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to PFS 360.

External Compensation for the Sale of Securities to Clients

PFS 360 does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of PFS 360.

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

Sharing of Capital Gains

This item is not applicable since PFS 360 only provides financial planning services.

Item 7: Types of Clients

Description

PFS 360 generally provides investment advice to individuals, high net worth individuals and businesses. Client relationships vary in scope and length of service.

Account Minimums

PFS 360 does not require a minimum for engagement.

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

Methods of Analysis

In developing a financial plan for a Client, PFS 360's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

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.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Investment Strategy

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. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Security Specific Material Risks

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 and should discuss these risks with PFS 360:

- *Market Risk*: The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

- *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.
- *Inflation Risk*: When any type of inflation is present, a dollar today will buy more than 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.
- *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.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also

subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- *REIT Risk:* To the extent that a client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- *Derivatives Risk:* Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases*: Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases*: Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of

principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.

- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading*: The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Leveraged Risk*: The risks involved with using leverage may include compounding of returns (this works both ways – positive and negative), possible reset periods, volatility, use of derivatives, active trading and high expenses.
- *Equity Linked CD Risk:* Penalties may apply to early withdrawals. Fair market value of CD's when sold in the secondary market may be worth more or less than face value. May or may not be FDIC insured. Returns are not based solely on market returns, as there may be a maximum rate of interest the CD will earn. May be taxed on income earned, but interest isn't accrued (received) until the CD matures. Many CDs may have "call" features, allowing the bank to close the contract early with no penalty, paying back principle and any accrued interest.
- *Structured Notes Risk:* The risks involved with using structured notes are credit risk of the issuing investment bank, illiquidity, and there is a risk to the pricing accuracy as most structured notes do not trade after issuance.
- *Hedge Funds Risk:* The risks involved with hedge funds are that they may invest in unregistered investments that are not subject to the SEC's registration and disclosure requirements. They may have risky investment strategies, which may include speculative investment and trading strategies. Both unregistered and registered hedge funds are illiquid investments and are subject to restrictions on transferability and resale. The tax structure of investments in hedge funds may be complex.
- *Private Equity/Placement Risk:* Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money

are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.

- *Counterparty Risk*: The risk that the other party to an agreement will default or fail to perform its contractual obligations. In an options contract, counterparty risk is the risk to the option buyer that the option writer will not buy or sell the underlying as agreed.
- *Foreign Investment Risk*: Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.
- *Senior Secured Debt*: Because senior loans can be made to non-investment grade borrowers, the risk of default may be greater. Should a borrower fail to make a payment or default, this may affect the overall return to the lender. Interest rate is another risk as interest rate changes will affect the amount of interest paid by a borrower in a floating rate senior loan.
- *Land*: Investments in land have unique risks with several restrictions and challenges. Factors to consider when in investing in land are zoning restrictions with the way the land can be used, environmental issues and access to utilities. Investing in land is a speculative investment and for small investors can be a high-risk gamble of earning a fair rate of return while continuing to have expenses while holding the land.
- *Energy Infrastructure*: Investments in energy infrastructure are subject to regulatory risk political risk, social risk, technological risk, climate and environmental risk and economic risk.
- *Hedged Equity Strategies*: Hedging is a risk management strategy to offset losses by taking an opposite position in a related asset. The reduction in risk provided by hedging also typically results in a reduction in protentional profits.
- *Managed Futures*: The risks associated with managed futures strategies include returns that may be biased upwards due to the voluntary nature of self-reporting of performance. Lack of natural measuring stick or benchmark for performance rating and the potential for higher fees.

- *Preferred stock:* One risk of preferred stocks is that shares are often sensitive to changes in interest rates. Investors in these vehicles don't enjoy the same voting rights as common shareholders.
- *Bonds*: The risks associated with bonds include the inverse relationship between interest rates and bond prices. As interest rates fall, bond prices rise. Conversely, when interest rates rise, bond prices tend to fall. Investors must also be aware of credit/default risk, corporate bonds aren't guaranteed by the full faith and credit of the U.S. government, but instead depend on the issue's ability to repay the debt.

Item 9: Disciplinary Information

Criminal or Civil Actions

PFS 360 and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

PFS 360 and its management have not been involved in administrative enforcement proceedings.

Self- Regulatory Organization Enforcement Proceedings

PFS 360 and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of PFS 360 or the integrity of its management.

Pursuant to Mass. Code Regs. 12.205(8)(d), Client can obtain the disciplinary history of PFS 360 or its representatives upon request of the Massachusetts Securities Division.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

No affiliated representatives of PFS 360 are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither PFS 360 nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

PFS 360 has an affiliated business PFS Tax Inc. that offers accounting and tax preparation services. Mr. Gauthier spends approximately 50% of his time in this practice. In this role, he receives separate yet typical compensation for his services. From time to time he may offer Clients services from this activity.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the compensation received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any services. Clients have the option to purchase these products through another tax or accounting professional of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

PFS 360 may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and PFS 360. Sub-Advisors execute all trades on behalf of PFS 360 in Client accounts. PFS 360 will be responsible for the overall direct relationship with the Client. PFS 360 retains the authority to terminate the Sub-Advisor relationship at PFS 360's discretion.

In addition to the authority granted to PFS 360, Clients will grant PFS 360 full discretionary authority and authorizes PFS 360 to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to PFS 360 in the Agreement. In addition, at PFS 360's discretion, PFS 360 may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. PFS 360 ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

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

Code of Ethics Description

The affiliated persons (affiliated persons include affiliated persons and/or independent contractors) of PFS 360 have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of PFS 360 affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of PFS 360. The Code reflects PFS 360 and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

PFS 360's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of PFS 360 may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

PFS 360's Code is based on the guiding principle that the interests of the Client are our top priority. PFS 360's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

PFS 360 will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

PFS 360 and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

PFS 360 and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide PFS 360 with copies of their brokerage statements.

The Chief Compliance Officer of PFS 360 is Christopher Gauthier, he reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

PFS 360 does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide PFS 360 with copies of their brokerage statements.

The Chief Compliance Officer of PFS 360 is Christopher Gauthier, he reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

PFS 360 will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. PFS 360 will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. PFS 360 relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by PFS 360. PFS 360 does not receive any portion of the trading fees.

PFS 360 will recommend the use of Altruist Financial LLC and Charles Schwab & Co., Inc.

- *Research and Other Soft Dollar Benefits*
  The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by PFS 360 from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although PFS 360 has no formal soft dollar arrangements, PFS 360 may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, PFS 360 receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of PFS 360. PFS 360 cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. PFS 360 does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

  A conflict of interest exists when PFS 360 receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that PFS 360 has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*
  PFS 360 does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*
  Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Aggregating Securities Transactions for Client Accounts

PFS 360 is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of PFS 360. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation if not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of PFS 360, Christopher Gauthier. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, PFS 360 suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' financial plan are changes in the tax laws, new investment information, and changes in a Client's personal situation (i.e. employment, marital status, inheritance, birth of a new child, etc.)

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than monthly for managed accounts. Account statements are issued by PFS 360's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. Item 14: Client Referrals and Other Compensation

Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest

PFS 360 may refer Clients to various affiliated and unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. PFS 360 may receive compensation for these referrals. Likewise, PFS 360 may receive non-compensated referrals of new Clients from various third parties.

Advisory Firm Payments for Client Referrals

PFS 360 does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by PFS 360.

PFS 360 is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of PFS 360.

If PFS 360 is authorized or permitted to deduct fees directly from the account by the custodian:

- PFS 360 will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- PFS 360 will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

Item 16: Investment Discretion

Discretionary Authority for Trading

PFS 360 requires discretionary authority to manage securities accounts on behalf of Clients. PFS 360 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 will authorize PFS 360 discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

PFS 360 allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to PFS 360 in writing.

PFS 360 does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

PFS 360 does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, PFS 360 may provide recommendations to the Client. If a conflict of interest exists, it will be disclosed.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because PFS 360 does not serve as a custodian for Client funds or securities and PFS 360 does not require prepayment of fees of more than $500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

PFS 360 has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

PFS 360 has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither PFS 360 nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

1. Neither PFS 360 nor its management have been involved in an arbitration claim alleging damages in excess of $2,500 involving any of the following:
   a) An investment or an investment-related business or activity;
   b) Fraud, false statement(s) or omissions;
   c) Theft, embezzlement or other wrongful taking of property;
   d) Bribery, forgery, counterfeiting, or extortion;
   e) Dishonest, unfair or unethical practices.

2. Neither PFS 360 nor its management have been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
   a) An investment or an investment-related business or activity;
   b) Fraud, false statement(s) or omissions;
   c) Theft, embezzlement or other wrongful taking of property;
   d) Bribery, forgery, counterfeiting, or extortion;
   e) Dishonest, unfair or unethical practices.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

ITEM 1 COVER PAGE

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Christopher Gauthier

Proactive Financial Solutions 360, LLC

Office Address:
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North Attleboro, MA 02760

Tel: (508) 316-9360

chris@PFS360llc.com

Website:
www.PFS360llc.com

This brochure supplement provides information about Christopher Gauthier and supplements the Proactive Financial Solutions 360, LLC brochure. You should have received a copy of that brochure. Please contact Christopher Gauthier if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher Gauthier (CRD #4861803) is available on the SEC's website at www.adviserinfo.sec.gov.

APRIL 4, 2024

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Christopher Gauthier

- Year of birth: 1980

Item 2 - Educational Background and Business Experience

Educational Background:

- Master of Science, Accounting, University of Massachusetts – Boston, 2010
- MBA, Bryant University, 2008
- BA, Liberal Studies, Providence College, 2005

Business Experience:

- Director of Tax, PFS Tax, Inc., 05/2022 to Present
- Owner, Director of Financial Planning, Chief Compliance Officer, Investment Advisor Representative, Proactive Financial Solutions 360, LLC, 04/2019 to Present
- Director of Tax Planning, Proactive Financial Solutions 360, LLC, 04/2019 to 05/2022
- Adjunct Professor, Roger Williams University, 08/2019 to 06/2021
- Accountant, Castro, Thresher and Oliviera P.C., 09/2019 to 05/2021
- Financial Planner, Corrigan Financial Inc., 06/2014 to 06/2019
- CPA, Charland, Marciano & Company, CPAs, LLP, 11/2011 to 06/2014

Professional Designations:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct.* The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.
  CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

<u>Certified Public Accountant (CPA):</u> A Certified Public Accountant is licensed by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- Bachelor's degree from an accredited college or university with a concentration in accounting.
- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA.
- Successful completion of the CPA Certification Exam.
- Follow a rigorous Code of Professional Conduct which requires they act with integrity, objectivity, due care, competence, and fully disclose conflicts of interest.
- In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period, or 120 hours over a three-year period).

<u>Certified Divorce Financial Analysts® (CDFA)</u>: A designation awarded to people with experience in the unique financial circumstances that surround a divorce. The professional training for the certification is focused on understanding and estimating the long-term costs of a divorce.

- <u>Experience</u> - CDFA practitioners must have a minimum of three years' work experience in a financial or legal capacity prior to earning the right to use the CDFA certification mark.
- <u>Education</u> - CDFA candidates must also develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the Institute for Divorce Financial Analysts™ (IDFA™).
- <u>Examination</u> - CDFA candidates must complete a four-part Educational Curriculum and Certification Exam that tests their understanding and knowledge of the financial

aspects of divorce. The candidate must also demonstrate the practical application of this knowledge in the divorce process by completing a comprehensive case study.

- Ethics - CDFA practitioners agree to abide by a strict code of professional conduct known as the IDFA Code of Ethics and Professional Responsibility, which sets forth their ethical responsibilities to the public, Clients, employers and other professionals. The IDFA may perform a background check during this process and each CDFA candidate must disclose any investigations or legal proceedings relating to his or her professional or business conduct.
- Ongoing Certification Requirements - CDFA practitioners are required to maintain technical competence and to fulfill ethical obligations. Practitioners must pay an annual reinstatement fee. Every two years, they must complete a minimum of fifteen (15) hours of continuing education specifically related to the field of divorce.

In addition to the biennial continuing education requirement, all CDFA practitioners must voluntarily disclose any public, civil, criminal, or disciplinary actions that may have been taken against them during the past two years as part of the renewal process.

Item 3 - Disciplinary Information

A. Christopher Gauthier has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contender (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Christopher Gauthier never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
(a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than $2,500 on him.

C. Christopher Gauthier has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

    1. Was found to have caused an investment-related business to lose its authorization to do business; or
    2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than $2,500.

D. Christopher Gauthier has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Christopher Gauthier is owner of PFS Tax, Inc., an accounting and tax preparation firm. Mr. Gauthier spends approximately 50% of his time in this practice. In this roe, he receives separate yet typical compensation for his services. From time to time he may offer Clients services from this activity.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the compensation received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any services. Clients have the option to purchase these services through another tax or accounting professional of their choosing.

Item 5 - Additional Compensation

Christopher Gauthier receives compensation for providing accounting and tax services. He does not receive any performance-based fees.

Item 6 - Supervision

Christopher Gauthier is the chief compliance officer of PFS 360. He is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at chris@PFS360llc.com or (508) 316-9360.

Item 7 - Requirements for State-Registered Advisors

A. Christopher Gauthier has not been involved in any of the following:

1. An arbitration claim alleging damages in excess of $2,500 involving any of the following:

    a) An investment or an investment-related business or activity;
    b) Fraud, false statement(s) or omissions;
    c) Theft, embezzlement or other wrongful taking of property;
    d) Bribery, forgery, counterfeiting, or extortion;
    e) Dishonest, unfair or unethical practices.

2. Been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

    a) An investment or an investment-related business or activity;
    b) Fraud, false statement(s) or omissions;
    c) Theft, embezzlement or other wrongful taking of property;

d) Bribery, forgery, counterfeiting, or extortion;
e) Dishonest, unfair or unethical practices.

B. Christopher Gauthier has not been the subject of a bankruptcy petition in last 10 years.