

Disclosure Brochure

FEBRUARY 28, 2017

Geremia Financial Services, LLC

a Registered Investment Advisor

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This brochure provides information about the qualifications and business practices of Geremia Financial Services, LLC (hereinafter "GFS"). If you have any questions about the contents of this brochure, please contact Frank Geremia, Jr. at (732) 738-5678. 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 Geremia Financial Services, LLC.

Item 2. Material Changes

This section of the Disclosure Brochure discusses only the material changes that have occurred since the last update of the Geremia Financial Services, LLC Disclosure Brochure.

There are no material changes to report.

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Supervised Persons - Brochure Supplements:

Frank V. Geremia Jr.

Frank V. Geremia Sr.

Item 4. Advisory Business

Geremia Financial Services, LLC is an investment advisor providing financial planning and investment management services. Prior to engaging GFS to provide any of the foregoing investment advisory services, the client is required to enter into one or more written agreements with GFS setting forth the terms and conditions under which GFS renders its services (collectively the "Agreement"). Neither GFS nor the client may assign the Agreement without the consent of the other party. A transaction that does not result in a change of actual control or management of GFS is not considered an assignment.

GFS has been registered as an investment advisor since April 2011. Frank Geremia, Jr. is the principal owner and managing member of GFS. As of December 31, 2016, GFS managed approximately \$44,800,000 on a discretionary basis.

This disclosure brochure describes the business of GFS. Certain sections will also describe the activities of Supervised Persons. Supervised Persons are any of GFS's officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on GFS's behalf and is subject to GFS's supervision or control.

Financial Planning Services

GFS may provide its clients with a broad range of comprehensive financial planning services (which may include non-investment related matters). These services may include certain tax considerations, cash flow needs of the client, insurance matters, and other areas that clients may wish to address. GFS includes these services as part of its overall investment management.

In performing its services, GFS is not required to verify any information received from the client or from the client's associated professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information. GFS may recommend the services of itself, and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if GFS recommends its own services. The client is under no obligation to act upon any of the recommendations made by GFS through its financial planning, but the financial plan is generally implemented as part of GFS's overall investment management for the client. Clients are advised that it remains their responsibility to promptly notify GFS if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising GFS's previous recommendations and/or services.

Investment Management and Wealth Management Services

Clients may engage GFS to manage all or a portion of their assets on a discretionary basis, which includes a broad range of comprehensive financial planning services. The level of financial planning provided to the client depends on the individual client's needs.

GFS primarily allocates clients investment management assets among individual equity securities, exchange-traded funds ("ETFs"), and/or options in accordance with the investment objectives of the client. GFS also provides advice about any type of investment held in clients' portfolios.

GFS tailors its advisory services to the individual needs of clients. Prior to investing any client assets, GFS meets with the client and develops an investment plan for the client. GFS ensures that clients' investments are suitable for their investment needs, goals, objectives and risk tolerance. Clients may impose reasonable restrictions on the management of their accounts (e.g., require that a portion of their assets are invested exclusively in socially responsible funds etc.).

Clients are advised to promptly notify GFS if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon GFS's management services.

Sponsor / Manager of Wrap Program

GFS is the sponsor and manager of the GFS Wrap Program (the "Program"), a wrap fee program. In the event the client participates in the Program, GFS provides its investment management services and arranges for brokerage transactions under a single annualized fee (payable quarterly). Participants in the Program may pay a higher or lower aggregate fee than if investment management and brokerage services were purchased separately. A complete description of the Program's terms and conditions (including fees) are contained in the Geremia Financial Services, LLC Wrap Fee Brochure. GFS does not provide any investment advisory services outside its wrap program.

Additions and Withdrawals to Accounts

Clients may make additions to and withdrawals from their account at any time, subject to GFS's right to terminate an account. Clients may withdraw account assets on appropriate notice to GFS and subject to the usual and customary securities settlement procedures. However, GFS designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives.

Item 5. Fees and Compensation

Geremia Financial offers its services on a fee basis based upon assets under management. Alternatively, certain of GFS Supervised Persons may offer insurance products under a commission arrangement.

Financial Planning Fees

As discussed above in response to Item 4, for certain clients, GFS includes financial planning as part of its investment management services. GFS does not charge a separate fee for financial planning.

Investment Management Fee

GFS offers its investment management services to participants of the Program (as discussed above in Item 4), whereby GFS charges an annual fee, based upon the amount of the assets under its management. The Program's fee is inclusive of brokerage commissions, transaction fees, and certain other related costs, as explained in depth in GFS's wrap fee program brochure, which appears as Part 2A Appendix 1 of Form ADV (the "Wrap Fee Brochure"). A complete description of the Program's terms and conditions (including fees) are contained in the Program's wrap fee brochure. This written disclosure statement is provided to each client pursuant to Rule 204-3 of the Investment Advisers Act of 1940.

GFS, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

Fees Charged by Financial Institutions

As further discussed in response to Item 12 (below), GFS generally recommends that clients utilize the brokerage and clearing services of Pershing, LLC through Pershing Advisors Solutions ("Pershing") for

investment management accounts.

GFS may only implement its investment management recommendations after the client has arranged for and furnished GFS with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to, Pershing or any other broker-dealer recommended by GFS and further broker-dealer(s) or trust companies, banks etc. directed by the client (collectively referred to herein as the "Financial Institutions").

Clients may incur certain charges imposed by the Financial Institutions and other third parties such as custodial fees, charges imposed directly by a mutual fund or ETF in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), 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. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions if any, are exclusive of and in addition to GFS's fee.

GFS's Agreement and the separate agreement with any Financial Institutions authorize GFS (through Pershing) to debit the client's account for the amount of GFS's fee and to directly remit that management fee to GFS. Any Financial Institutions recommended by GFS have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to GFS. GFS does provide an option for clients to pay by any method other than direct debit.

Fees for Management During Partial Quarters of Service

For the initial period of investment management services, the fees shall be calculated on a pro rata basis.

The Agreement between GFS and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. GFS's fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Additions may be in cash or securities provided that GFS reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. GFS may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will be prorated based on the number of days remaining in the quarter.

Commissions or Sales Charges for Recommendations of Securities

Neither GFS nor its Supervised Persons receive commissions for the purchase or sale of securities.

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

GFS does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains or capital appreciation of the assets of the clients.

Item 7. Types of Clients

GFS provides its services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

GFS does not impose a minimum portfolio size or minimum annual fee.

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

Methods of Analysis and Investment Strategies

GFS's primary methods of analysis are fundamental, technical and cyclical analysis.

Fundamental analysis involves the fundamental financial condition and competitive position of a company. GFS will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that GFS will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that GFS is recommending. The risks with cyclical analysis are similar to those of technical analysis.

GFS initially develops client portfolios using a "top down" macro level view of the economy. From there, GFS uses a "bottom up" fundamental approach to select particular securities. GFS constructs client portfolios through the use of ETFs and individual securities, but also utilizes options as a risk measure to hedge client portfolios.

Risk of Loss

Individual Equity Securities:

An investment in individual equity securities involves risk, including the possible loss of principal. An equity security signifies an ownership position of a firm or corporation and it further represents a claim on its proportional share of the corporation's assets and profits. Ownership in the corporation is ultimately determined by the number of shares owned divided by the total number of shares of the corporation that are outstanding. Equity securities may or may not provide a

separate stream of income commonly called “dividends” and may be issued in common (ordinary) shares or in preferred or other classes of shares. The price of each individual equity share may fluctuate significantly in their market value with the ups and downs of the economic cycle and with the fortunes of the issuing firm.

Options:

Options allow investors to buy or sell a security at a contracted “strike” price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are possibly subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Exchange Traded Funds (ETFs):

An investment in an ETF involves risk, including the loss of principal. ETFs are subject to secondary market trading risks. Shares of ETFs are listed for trading on an exchange, however, there can be no guarantee that an active trading market for such shares will develop or continue. There can be no guarantee that an ETFs’ exchange listing or ability to trade its shares will continue or remain unchanged. Shares of the ETF may trade on an exchange at prices equal to, above or below their most recent net asset valuation (NAV), which is the price at which an investor would buy or sell the ETF. The per share NAV of an ETF is calculated at the end of each business day, and fluctuates with changes in the market value of the ETF’s holdings. The trading prices of an ETFs shares may differ significantly from NAV during periods of market volatility, which may, among other factors, lead to the ETF’s shares trading at a premium or discount to NAV.

Mutual Funds:

A mutual fund is a type of professionally-managed collective investment vehicle that pools money from many investors to purchase securities. While there is no legal definition of mutual fund, the term is most commonly applied only to those collective investment vehicles that are regulated, available to the general public and open-ended in nature. Hedge funds are not considered a type of mutual fund. An investment in a mutual fund involves risk, including the loss of principal. An individual mutual fund portfolio may include various types of stocks, various types of bonds, or both or an index on an industry wide average such as the Standard and Poor’s 500. An investment in a mutual fund will allow the selection of the underlying stock, bonds or indices to be made by an investment professional other than GFS.

Market Risks

The profitability of a significant portion of GFS’s recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that GFS will be able to predict those price movements accurately.

Management Through Similarly Managed Accounts

GFS manages portfolios by allocating portfolio assets among various securities on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as “GFS Investment Strategy”). In so doing, GFS buys, sells, exchanges and/or transfers securities based upon the GFS

Investment Strategy.

GFS's management, using the GFS Investment Strategy, complies with the requirements of Rule 3a-4 of the Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly managed accounts, such as the GFS Investment Strategy, with a safe harbor from the definition of an investment company.

Securities in the GFS Investment Strategy are usually exchanged and/or transferred without regard to a client's individual tax ramifications. Certain investment opportunities that become available to GFS's clients may be limited. As further discussed in response to Item 12B (below), GFS allocates investment opportunities among its clients on a fair and equitable basis.

Use of Margin

To the extent that a client authorizes the use of margin, and margin is thereafter employed by GFS in the management of the client's investment portfolio, the market value of the client's account and corresponding fee payable by the client to GFS will not be increased.

While the use of margin borrowing can substantially improve returns, such use may also increase the adverse impact to which a client's portfolio may be subject. Trading on margin involves an increased level of risk and may not be suitable for all investors. Investors who trade on margin generally borrow money from a broker-dealer to buy securities using their investment portfolio or other assets as collateral. While margin allows for investors to increase their purchasing power, it also exposes them to potentially higher losses. Clients utilizing margin are advised that: (i) they may lose more money than they have invested; (ii) they may have to deposit additional cash or securities in their accounts on short notice to cover market losses; (iii) they may be forced to sell some or all of their securities when falling stock prices reduce the value of their securities; and (iv) the lending broker-dealer may sell some or all of their securities without consulting them to pay off a margin loan. In addition, investors who trade on margin pay interest on their borrowings and are therefore subject to interest rate fluctuations, which could have a significant effect on the profitability of their account.

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Item 9. Disciplinary Information

GFS is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. GFS does not have any required disclosures regarding this Item.

Item 10. Other Financial Industry Activities and Affiliations

GFS is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. GFS has described such relationships and arrangements below.

Insurance Activities

Certain of GFS's Supervised Persons, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. While GFS does not offer such insurance products to its investment advisory clients, GFS does permit its Supervised Persons, in their individual capacities as licensed insurance agents, to offer insurance products to GFS's investment advisory clients. A conflict of interest exists to the extent that GFS recommends the purchase of insurance products where GFS's Supervised Persons may receive insurance commissions or other additional compensation. GFS's Supervised Persons currently devote less than one percent (1%) of their time to insurance sales.

Mortgage Broker

GFS may recommend, on a fully-disclosed basis, the purchase of certain mortgage products. GFS is under common control with Geremia Capital, LLC ("GCAP"). GCAP is a duly licensed mortgage broker in certain states. While GFS does not offer such mortgage products to its investment advisory clients, GFS does permit its related mortgage brokerage firm (GCAP) to offer mortgage products to GFS's investment advisory clients. A conflict of interest exists to the extent that if GCAP recommends the purchase of mortgage products, GCAP may receive commissions or other additional compensation. GFS's Supervised Persons devote less than one percent (1%) of their time to mortgage products.

Item 11. Code of Ethics

GFS and persons associated with GFS ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with GFS's policies and procedures.

GFS has adopted a code of ethics ("Code of Ethics") made up of its personal securities transaction and insider trading policies and procedures. When GFS is purchasing or considering for purchase any security on behalf of a client, no Covered Person (as defined below) may effect a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when GFS is selling or considering the sale of any security on behalf of a client, no Covered Person may effect a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security.

Unless specifically defined in GFS's procedures (summarized above), neither GFS nor any of GFS's Associated Persons may effect for himself or herself, for an Associated Person's immediate family (i.e., spouse, minor children, and adults living in the same household as the Associated Person), or for trusts for which the Associated Person serves as a trustee or in which the Associated Person has a beneficial interest (collectively "Covered Persons"), any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of GFS's clients.

The foregoing policies and procedures are not applicable to (a) transactions effected in any account over which neither GFS nor any of its Supervised Persons (as defined in this Form ADV) has any direct or indirect influence or control; and (b) transactions in securities that are: direct obligations of the

government of the United States; bankers' acceptances, bank certificates of deposit, commercial paper, and high quality short-term debt instruments, including repurchase agreements; or shares issued by registered open-end investment companies.

This policy has been established recognizing that some securities being considered for purchase and sale on behalf of GFS's clients, trade in sufficiently broad markets to permit transactions by clients to be completed without any appreciable impact on the markets of such securities. Under certain limited circumstances, exceptions may be made to the policies stated above. GFS will maintain records of these exceptional trades, including the reasons for any exceptions.

In accordance with Section 204A of the Advisers Act, GFS also maintains and enforces written policies reasonably designed to prevent the unlawful use of material non-public information by GFS or any of its Supervised Persons.

Clients and prospective clients may contact GFS to request and receive a copy of its Code of Ethics.

Item 12. Brokerage Practices

As discussed above, in Item 5, GFS generally recommends that clients utilize the brokerage and clearing services of Pershing LLC, a subsidiary of the Bank of New York Mellon.

Factors which GFS considers in recommending Financial Institutions including Pershing or certain other broker-dealers to clients include their respective financial strength, reputation, execution, pricing, research and service. Pershing enables GFS to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Pershing may be higher or lower than those charged by other Financial Institutions.

The commissions paid by GFS's clients comply with GFS's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where GFS determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. GFS seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

GFS periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

The client may direct GFS in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and GFS will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by GFS (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, GFS may decline a client's request to direct brokerage if, in GFS's sole discretion, such

directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client can be effected independently or collectively should GFS decide to purchase or sell the same securities for several clients at approximately the same time. GFS may (but is not obligated to) combine or “batch” such orders to obtain best execution or to allocate equitably among GFS’s clients differences in prices or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among GFS’s clients pro rata on any given trading day. To the extent that GFS determines to aggregate client orders for the purchase or sale of securities, including securities in which GFS’s Supervised Persons may invest, GFS shall generally do so in accordance with applicable rules promulgated under the Advisers Act and “no-action” guidance provided by the staff of the U.S. Securities and Exchange Commission. GFS shall not receive any additional compensation or remuneration as a result of the aggregation. In the event that GFS determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, GFS may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist GFS in its investment decision-making process. Such research generally will be used to service all of GFS’s clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client’s portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because GFS does not have to produce or pay for the products or services.

Software and Support Provided by Financial Institutions

GFS may receive from Pershing, without cost to GFS, computer software and related systems support, which allow GFS to better monitor the client accounts maintained at Pershing. GFS may receive the software and related support without cost because GFS renders investment management services to clients that maintain assets at Pershing. The software and related systems support may benefit GFS, but not its clients directly. In fulfilling its duties to its clients, GFS endeavors at all time to put the interests of its clients first. Clients should be aware, that GFS’s receipt of economic benefits, from a broker-dealer creates a conflict of interest since these benefits may influence GFS’s choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, GFS may receive the following benefits from Pershing through its Pershing Advisor Solutions division: receipt of duplicate client confirmations and duplicate client statements; access to a trading desk

that exclusively services its Pershing Advisor Solutions participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

GFS does not receive client referrals from Pershing.

Item 13. Review of Accounts

For those clients to whom GFS provides investment management services, GFS monitors those portfolios as part of an ongoing and continuous process. Additionally, regular account reviews are conducted on at least a quarterly basis. For those clients to whom GFS provides financial planning services, reviews are conducted on an “as needed” basis as part of GFS’s ongoing investment management services. Such reviews are generally conducted by Frank Geremia, Jr., but may also be conducted by Frank Geremia, Sr. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with GFS and to keep GFS informed of any changes thereto. GFS shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client’s financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts.

Item 14. Client Referrals and Other Compensation

GFS is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, GFS is required to disclose any direct or indirect compensation that it provides for client referrals.

GFS may receive economic benefits from non-clients for providing advice or other advisory services to clients. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 12, above.

If a client is introduced to GFS by either an unaffiliated or an affiliated solicitor, GFS may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act and any corresponding state securities law requirements. Any such referral fee is paid solely from GFS’s investment management fee, and does not result in any additional charge to the client. If the client is introduced to GFS by an unaffiliated solicitor, the solicitor provides the client with a copy of GFS’s written disclosure brochure which meets the requirements of Rule 204-3 of the Advisers Act and a copy of the solicitor’s disclosure statement containing the terms and conditions of the solicitation arrangement including compensation. Any affiliated solicitor of GFS discloses the nature of his/her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of GFS’s disclosure brochure at the time of the solicitation.

Item 15. Custody

GFS's Agreement and/or a separate agreement with any Financial Institution or Institutions may authorize GFS through such Financial Institution to debit the client's account for the amount of GFS's fee and to directly remit that management fee to GFS in accordance with applicable custodial rules.

The Financial Institutions recommended by GFS have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to GFS. Clients should carefully review the statements sent directly by the Financial Institutions to each individual client.

Item 16. Investment Discretion

GFS is given the authority to exercise discretion on behalf of clients. GFS is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. GFS is given this authority through a power-of-attorney included in the Agreement between GFS and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Thus, GFS takes discretion over the following activities:

- The securities to be purchased or sold;
- The quantity of securities to be purchased or sold; and
- When transactions are made.

Item 17. Voting Client Securities

GFS is required to disclose if it accepts authority to vote client securities.

Pursuant to SEC Rule 206(4)-6 concerning proxy voting policy, GFS will generally vote in accordance with management's recommendations unless GFS determines that voting in such a manner is in conflict with the best interests of GFS's clients. In these cases, GFS will evaluate and vote the proxies on a case-by-case basis. Advisory Clients may obtain a copy of GFS's revised and complete proxy voting policies and procedures upon request from GFS at (732) 738-5678. Clients may also obtain information from GFS about how GFS had previously voted any proxies on behalf of any client.

Item 18. Financial Information

GFS does not require or solicit the prepayment of more than \$500 in fees, six months or more in advance. In addition, GFS is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. GFS has no disclosures pursuant to this Item. GFS has not been the subject of a bankruptcy petition in the past ten years.

Item 19. Requirements for State Registered Investment Advisors

Principal Executive Officers and Management Persons

Below is the formal education and business background of each of Geremia Financial Services, LLC principal executive and management persons:

FRANK GEREMIA, JR.

Born 1971 Post-Secondary Education: St. John's University – 1994, B.S., Finance

Recent Business Background:

Geremia Financial Services, LLC, Managing Member, 02/2005– Present

The Investment Center, Inc., Registered Representative, 02/2005- 06/2011

IC Advisory Services, Inc., Investment Adviser Representative, 06/2006 – 06/2011

Geremia Financial Services, LLC, Investment Advisor Representative, 06/2011 - Present

FRANK GEREMIA, SR.

Born 1940 Post-Secondary Education: St. Peter's College – 1962, B.S., Accounting

Recent Business Background:

Geremia Financial Services, LLC Representative, 02/2005–Present;

The Investment Center, Inc. Registered Representative, 02/2005 - 06/2011

IC Advisory Services, Inc., Investment Adviser Representative, 06/2006 – 06/2011

Geremia Financial Services, LLC, Investment Advisor Representative, 06/2011 – Present

None of the Supervised Persons of GFS are compensated for advisory services with performance-based fees. In addition, neither GFS nor its management persons have been the subject of the type of disciplinary event described in the instructions to Item 10. Neither GFS nor any of its Supervised Persons have a relationship or arrangement with any issuers of securities not otherwise disclosed.

Geremia Financial Services, LLC Disclosure Brochure

Geremia Financial Services, LLC

a Registered Investment Advisor

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www.geremiafinancial.com