

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

A.

American Retirement & Investment Strategies, LLC

14 Fleetwood Drive
Gloucester, MA 01930
978-283-1011

8 Wildebrook Road
Medway, MA 02053
508-533-7370

www.investinaris.com

February 13, 2025

B.

This brochure provides information about the qualifications and business practices of American Retirement & Investment Strategies, LLC. If you have any questions about the contents of this brochure, please contact us at 978-283-1011 and/or joeg@investinaris.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about American Retirement & Investment Strategies, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

There are no material changes from our last annual update.

Item 3 Table of Contents

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Item 4 Advisory Business

A. American Retirement & Investment Strategies, LLC (“ARIS, LLC”) established in 2006, is an investment adviser providing financial planning, consulting, and investment management services to individuals, retirement plans, trusts, estates, charitable organizations, corporations and business entities.

ARIS, LLC, depending upon the engagement, offers its services on a fee basis which may include hourly and/or fixed fees as well as fees based upon assets under management.

Prior to engaging ARIS, LLC to provide any of the foregoing investment advisory services, the client will be required to enter into one or more written agreements with ARIS, LLC setting forth the terms and conditions under which ARIS, LLC will render its services (collectively the “Agreement”).

All individuals that render investment advisory services on behalf of ARIS, LLC must have earned a college degree and/or have substantive investment-related experience. In addition, all such individuals shall have attained all required investment-related licenses and/or designations. The principals of the firm are:

WILLIAM D'ANNIBALE

Born 1963

Certified Estate and Trust Specialist™

Post-Secondary Education:

Bentley College - 1993, MBA, International Finance

Babson College - 1990, BS, Investments and Finance

Recent Business Background:

American Retirement & Investment Strategies, LLC, Managing Member, 04/2006 - Present

Purshe Kaplan Sterling Investments, Registered Representative, 04/2006 - 12/2012

Smith Barney, Financial Advisor, 09/2003 - 04/2006

UBS Painewebber Inc., Financial Advisor, 08/2002 - 09/2003

Meridian Research, Vice President of Sales and Research, 09/2001 - 07/2002

EMC Corp., Vice President of Marketing, 10/1999 - 05/2001

JOSEPH M. GRELLA, CFP®

Born 1958

CERTIFIED FINANCIAL PLANNER™

Post-Secondary Education:

Kaplan College – 2003, Certified Financial Planner

Northeastern University - 1989, MBA, Finance

Bridgewater State University - 1980, BA, Communications

Recent Business Background:

American Retirement & Investment Strategies, LLC, Managing Member, 04/2006 - Present

Purshe Kaplan Sterling Investments, Registered Representative, 04/2006 - 12/2012

Smith Barney, Financial Advisor, 09/2003 - 04/2006

UBS Painewebber Inc., Financial Advisor, 07/2002 - 09/2003

Genuity, Senior Manager, 06/2000 - 07/2002

CERTIFIED FINANCIAL PLANNER™ professional

Joseph M. Grella is a certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional and may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP®

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

B. ARIS, LLC will offer advice on the following types of investments;

- equity securities (exchange traded and over the counter) and equity options,
- corporate debt securities, commercial paper, and certificates of deposit,
- municipal securities, and government securities,
- mutual funds,
- exchange traded funds (ETFs),
- Real Estate Investment Trusts (REITs),
- partnerships in oil and gas interests and
- any type of investment held in a client's portfolio at the beginning of the advisory relationship.

ARIS, LLC also may render non-discretionary investment management services to clients relative to: (1) variable life/annuity products that they may own, and/or (2) their individual employer-sponsored retirement plans. In so doing, ARIS, LLC either directs or recommends the allocation of client assets among the various mutual fund subdivisions that comprise the variable life/annuity product or the retirement plan. The client assets can be maintained at either the specific insurance company that issued the variable life/annuity product which is owned by the client, or at the custodian designated by the sponsor of the client's retirement plan.

C. In performing its services, ARIS, LLC will not be required to verify any information received from the client or from the client's other professionals (e.g. attorney, accountant, etc.) and is expressly authorized to rely on such information. ARIS, LLC may recommend the services of itself, and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if ARIS, LLC recommends its own services.

The client is under no obligation to act upon any of the recommendations made by ARIS, LLC under a financial planning / consulting engagement and/or engage the services of any such recommended professional, including ARIS, LLC itself. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of ARIS, LLC's recommendations. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify ARIS, LLC if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing, evaluating, or revising ARIS, LLC's previous recommendations and/or services.

ARIS, LLC offers advice on each type of investment as described above in section B. However, ARIS, LLC intends to primarily allocate its client's investment management assets, on a discretionary basis among mutual funds, money market funds, exchange traded funds, individual debt and equity securities and/or options as well as the securities components of variable annuities and variable life insurance contracts in accordance with the investment objectives of the client.

D. ARIS, LLC does not participant in a wrap fee program.

E. As of December 31, 2024, ARIS, LLC has the following amount of assets under management:

Discretionary basis	\$ 72,887,669
Non-Discretionary basis	\$ 23,168,232

Item 5 Fees and Compensation

A. ARIS, LLC provides its clients with a broad range of comprehensive financial planning, consulting and investment management services (which may include non-investment related matters). ARIS, LLC's fee structure is as follows:

Financial Planning and Consulting Fees

ARIS, LLC will charge a fixed fee and/or hourly fee for these services. These fees are negotiable, but generally range from \$500 to \$1,500 on a fixed fee basis and/or from \$150 to \$300 on an hourly rate basis, depending upon the level and scope of the services and the professional rendering the financial planning and/or the consulting services.

If the client engages ARIS, LLC for additional investment management services (outside financial planning or consulting), ARIS, LLC may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

Prior to engaging ARIS, LLC to provide financial planning and/or consulting services, the client will be required to enter into a written agreement with ARIS, LLC setting forth the terms and conditions of the engagement and describing the scope of the services to be provided and the portion of the fee that is due from the client prior to ARIS, LLC commencing services. ARIS, LLC requires one-half of the financial planning / consulting fee (estimated hourly or fixed) payable upon entering the written agreement. The balance is due upon delivery of the financial plan or completion of the agreed upon services.

Either party may terminate the agreement by written notice to the other. In the event the client terminates ARIS, LLC's financial planning and/or consulting services, the balance of ARIS, LLC's unearned fees (if any) shall be refunded to the client. If termination occurs within five business days of entering into an agreement for such services the client shall be entitled to a full refund.

Investment Management Fees

If engaged, ARIS, LLC will charge an annual fee based upon a percentage of the market value of the assets being managed by ARIS, LLC. ARIS, LLC's annual fee shall be prorated and charged quarterly, in arrears, based upon the market value of the assets on the last day of the previous quarter (or the last day the account is funded, if closed).

- The annual fee for investment management services will be between 0.50% and 1.60%,
- The annual fee for retirement plan services will be between 0.15% and 0.75%, and
- The annual fee for college plan accounts will be between 0.25% and 0.30%
- An additional fee charged for the Dynamic Portfolio strategy is 0.30% (30 basis points) more than the fee charged to the rest of the portfolio.

For example, if a client pays an annual fee of 0.80% (80 basis points) for all their accounts, then only the specific account used purposely for the Dynamic Portfolio will be charged 0.80% + 0.30%, for a total annual fee of 1.10%.

All fees will be dependent upon the market value of the assets under management and the type of investment management services to be rendered.

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

Table of Fees for Services

Carefully read Item 4 and Item 5 of Form ADV Part 2A (“Brochure”), as these sections of the Brochure contain important details about American Retirement & Investment Strategies, LLC advisory services and fees. Fees may be negotiable. The fees below will only apply to you when you request the services listed.

Fees Charged by Investment Adviser	Fee Amount	Frequency Fee is Charged	Services
Assets Under Management Fee	0.50% to 1.60%	An Annual Fee, Charged Quarterly in Arrears	Portfolio management for individuals and small businesses; and Financial Planning Services
Hourly Fee	\$150 to \$300	½ at Start ½ at Completion	Ad hoc wealth management advice
Subscription Fee	N/A		
Fixed Fee	\$500 - \$1500	½ at Start ½ at Completion	Financial Plans
Commissions to the Adviser	N/A		
Performance-based Fee	N/A		
Other (401 K Plans)	.15% to .75%	An Annual Fee, Charged Quarterly in Arrear (Unless RK charges monthly in arrears)	Investment Management Services for Companies and their 401k Participants
Other (529 Accounts)	.25% - .30%	An Annual Fee, Charged Quarterly in Arrears	Investment Management Services for 529 Account Owners and Beneficiaries
Dynamic Portfolio	.30%	An Annual Fee, Charged Quarterly in Arrears. It is combined with the AUM Fee for the account using this strategy	Proprietary Equity Investment Strategy
Fees Charged by Third Parties	Fee Amount	Frequency Fee is Charged	Services
Third Party Money Manager	N/A		
Robo-Adviser Fee	N/A		
Talk with your Adviser about fees and costs applicable to you			

Additional fees and costs to discuss with your Adviser

Additional Fees/Cost	Yes/No	Paid To
Brokerage Fees	Yes	Fidelity
Commissions	Yes	Fidelity
Custodian Fees	Yes	Fidelity
Mark-ups	No	N/A
Mutual Fund/ETF Fees and Expenses	Yes	Mutual Fund and ETF Companies

Effective 02/13/2025

C. ARIS, LLC's Agreement and/or the separate agreement with the Financial Institution(s) (as described in section C below) authorizes ARIS, LLC through the Financial Institution(s) to debit the client's account for the amount of ARIS, LLC's fee and to directly remit that management fee to ARIS, LLC in accordance with applicable custody rules. The Financial Institution(s) recommended by ARIS, LLC 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 ARIS, LLC.

To the extent that a client authorizes the use of margin, and margin is thereafter employed by ARIS, LLC 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 ARIS, LLC will be increased. As a result, in addition to understanding and assuming the additional principal risks associated with the use of margin, clients authorizing margin are advised of the potential conflict of interest whereby the client's decision to employ margin shall correspondingly increase the management fee payable to ARIS, LLC. Accordingly, the decision as to whether to employ margin is left totally to the discretion of the client.

D. As discussed in response to Item 12 Brokerage Practices (below), ARIS, LLC's annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. However, ARIS, LLC will not receive any portion of these commissions, fees, and costs.

ARIS, LLC may only implement its investment management recommendations after the client has arranged for and furnished ARIS, LLC with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions shall include, but are not limited to, Fidelity, any other broker-dealer recommended by ARIS, LLC, broker-dealer directed by the client, trust companies, banks etc. (collectively referred to herein as the "Financial Institution(s)"). Clients may incur certain charges imposed by the Financial Institution(s) and other third parties such as custodial fees, charges imposed directly by a mutual fund or exchange traded fund 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. Such charges, fees and commissions are exclusive of and in addition to ARIS, LLC's fee.

E. Except as stated above for Financial Planning and Consulting Fees, no additional fees are paid in advance.

ARIS, LLC derives less than 50% of annual revenue from non-fee compensation.

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

Neither ARIS, LLC, nor any of our supervised persons accept performance-based fees.

Item 7 Types of Clients

ARIS, LLC provides investment advice, to individuals, trusts, and businesses that offer retirement plans to their employees. All new accounts are opened at the discretion of ARIS, LLC, and a typical minimum account size is \$100,000. However, this may be waived at the discretion of ARIS, LLC.

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

A. ARIS, LLC has developed five investment strategies based on unique levels of risk tolerance, time horizon and overall financial goals that clients specify through an in-depth interview and information gathering process that is documented in the Client Profile. Upon the review of each client profile, ARIS, LLC then analyzes each client's financial circumstances, investment objectives, and risk tolerance which will all be used to formulate an appropriate Investment Policy Statement (IPS).

The Six investment strategies used by ARIS, LLC can be categorized in the following models:

1. **Preservation & Income** - To provide a conservative allocation that is adverse to short-term loss and is constructed to accept only minimal fluctuations in the portfolio value. The investment objective is **LOW VOLATILITY**.
2. **Conservative Growth & Income** - To provide a conservative allocation that offers low fluctuation in the portfolio value. The investment objective is **CONSERVATIVE (Allocation--20% to 40% Equity)**
3. **Moderate Growth & Income** - To provide a moderate allocation that is constructed to provide a moderate level of fluctuation in the portfolio value. The investment objective is **MODERATE (Allocation--50% to 70% Equity)**
4. **Growth** - To provide an aggressive allocation, with a minimal concern with short-term fluctuations in the portfolio. The investment objective is **AGGRESSIVE (Allocation--75%+ Equity)**
5. **Retirement Income** - To provide an aggressive allocation with minimal concern about the level of fluctuation in my portfolio value. The investment objective is **WITHDRAWAL RATE UPTO 5%.(Allocation--50% to 70% Equity)**
6. **All Equity Balanced or All Equity Growth**

In addition, ARIS, LLC provides an enhanced proprietary equity only strategy called the Dynamic Portfolio.

The methods of analysis used to develop the above investment strategies include primarily:

- **Fundamental Analysis;**

This methodology is used to determine “what” to buy/sell based on the unique intrinsic value of each security. Fundamental analysis attempts to study everything that can affect the security’s value, including macroeconomics factors (for example overall economy and industry

conditions) and company-specific factors (for example financial conditions and management of companies).

○ **Technical Analysis:**

This methodology is used to evaluate securities, sectors, asset classes, etcetera, by means of studying statistics generated by market activities, such as past prices, volume, and relative strength. Technical analysis does not attempt to measure the intrinsic value of a company (as the Fundamental Analysis would), but instead uses stock charts to identify patterns and trends that may suggest what a security will do in the future.

It is important to realize that investing in securities (including stocks, bonds, CDs, mutual funds, etcetera) involves risks of loss that could largely erode the initial capital invested. This could happen even when a portfolio is well balanced and diversified. Investing in the stock market requires clients to fully understand significant losses can result in every security.

B. Every investment strategy (which has already been explained under the prior section) includes a different level of risk. Generally speaking and based on observations of past performances, the higher the level of equities in a strategy the higher the level of risk. Therefore, with the extent of our five investment strategies the Retirement Income Model carries the lowest level of risk for clients, while the Aggressive Model carries the highest level of risk for clients.

ARIS, LLC uses a combination of methods (see prior section for details) to minimize the impact of wide fluctuations and unusual risks which the market can experience from time to time. Furthermore, each client portfolio will be balanced and well diversified across many asset classes and different types of securities. There may be times when special hedge or protection strategies will be utilized to further isolate the portfolios from unusual risks. These special hedge or protection strategies may involve the use of inverse securities.

ARIS, LLC believes that by balancing and diversifying a client's portfolio across many types of asset classes can smooth out significant or unusual risks.

ARIS, LLC does not expect frequent trading of securities.

C. As already explained in section A and section B above, each security and each investment carries a particular type of risk.

ARIS, LLC does not foresee any particular type of security used within investment strategies that involves significant or unusual risks for the clients' portfolios. Generally speaking, the risks involved with the securities used by ARIS, LLC are risks explained and understood by clients and which are of general knowledge.

Item 9 Disciplinary Information

Neither ARIS, LLC, nor any of its management people have an event to disclose.

Item 10 Other Financial Industry Activities and Affiliations

A. No advisor with ARIS, LLC is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. ARIS, LLC or Advisory Affiliates are not registered as a futures commission merchant, commodity pool operator, or commodity trading advisor.

C. ARIS, LLC or Advisory Affiliates have no relation with or conflicts of interest to declare.

D. Certain of ARIS, LLC's *Advisory Affiliates*, 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 ARIS, LLC does not sell such insurance products to its investment advisory clients, ARIS, LLC does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that ARIS, LLC recommends the purchase of insurance products where ARIS, LLC's *Advisory Affiliates* receive additional compensation.

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

A. Not applicable to ARIS, LLC.

B. Unless specifically defined in ARIS, LLC's policies and procedures regarding insider trading and personal securities transactions, otherwise known as the Code of Ethics, neither ARIS, LLC nor any of ARIS, LLC'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 ARIS, LLC's clients.

The foregoing Code of Ethics is not applicable to (a) transactions effected in any account over which neither ARIS, LLC nor any of its Advisory Affiliates (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.

The Code of Ethics has been established recognizing that some securities being considered for purchase and sale on behalf of ARIS, LLC'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 Code of Ethics stated above. ARIS, LLC will maintain records of these trades, including the reasons for any exceptions. In accordance with Section 204A of the Advisers Act, ARIS, LLC also maintains and enforces written policies reasonably designed to prevent the unlawful use of material non-public information by ARIS, LLC or any of its Advisory Affiliates. ARIS, LLC's Code of Ethics is available to all current and prospective clients upon request.

C. Not applicable to ARIS, LLC.

D. ARIS, LLC and persons associated with ARIS, LLC ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with ARIS, LLC's policies and procedures. When ARIS, LLC is purchasing or considering for purchase any security on behalf of a client, no Covered Person 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 ARIS, LLC 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.

Item 12 Brokerage Practices

A. ARIS, LLC will generally recommend that clients utilize the brokerage and clearing services of Fidelity Investments and its affiliates (collectively referred to as “Fidelity”) for investment management accounts.

The brokerage commissions and/or transaction fees charged by Fidelity or any other designated broker-dealer are exclusive of and in addition to ARIS, LLC's fee. Factors which ARIS, LLC considers in recommending Fidelity or any other broker-dealer, to clients include their respective financial strength, reputation, execution, pricing, research, and service. Fidelity enables ARIS, LLC to obtain many mutual funds and exchange traded funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Fidelity may be higher or lower than those charged by other broker-dealers. The commissions paid by ARIS, LLC's clients shall comply with ARIS, LLC's duty to obtain “best execution.”

Consistent with the foregoing, while ARIS, LLC will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions. If the client requests ARIS, LLC to arrange for the execution of securities brokerage transactions for the client's account, ARIS, LLC shall direct such transactions through broker-dealers that ARIS, LLC reasonably believes will provide best execution.

ARIS, LLC shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution. The client may direct ARIS, LLC in writing to use a particular broker-dealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and ARIS, LLC will not seek better execution services or prices from other broker-dealers or be able to “batch” client transactions for execution through other broker-dealers with orders for other accounts managed by ARIS, LLC (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, ARIS, LLC may decline a client's request to direct brokerage if, in ARIS, LLC's sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers.

BLOCK TRADING

Transactions for each client generally will be effected independently, unless ARIS, LLC decides to purchase or sell the same securities for several clients at approximately the same time. ARIS, LLC may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among ARIS, LLC's clients differences in prices and commissions 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 ARIS, LLC's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that ARIS, LLC determines to aggregate client orders for the purchase or sale of securities, including securities in which ARIS, LLC's Advisory Affiliate(s) may invest, ARIS, LLC 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. ARIS, LLC shall not receive any additional compensation or remuneration as a result of the aggregation.

In the event that ARIS, LLC 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, ARIS, LLC 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.

RESEARCH and OTHER SOFT DOLLAR BENEFITS

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

Additionally, ARIS, LLC may receive the following benefits from Fidelity through the Fidelity Institutional Wealth Services Group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Fidelity Institutional Wealth Services Group 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.

Advisory Affiliates in their respective individual capacities are licensed insurance agents.

Item 13 **Review of Accounts**

For those clients to whom ARIS, LLC provides investment management services, ARIS, LLC monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. For those clients to whom ARIS, LLC provides financial planning and/or consulting services, reviews are conducted on an “as needed” basis. Such reviews are conducted by at least one of ARIS, LLC's Principals, Joseph Grella and/or William D'Annibale. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with ARIS, LLC and to keep ARIS, LLC informed of any changes thereto. ARIS, LLC 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. Those clients to whom ARIS, LLC provides investment advisory services will also receive a report from ARIS, LLC that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance not less than annually. Those clients to whom ARIS, LLC provides financial planning and/or consulting services will receive reports from ARIS, LLC summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by ARIS, LLC.

Item 14 **Client Referrals and Other Compensation**

If a client is introduced to ARIS, LLC by either an unaffiliated or an affiliated solicitor, ARIS, LLC 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 shall be paid solely from ARIS, LLC's investment management fee, and shall not result in any additional charge to the client.

If the client is introduced to ARIS, LLC by an unaffiliated solicitor, the solicitor shall provide the client with a copy of ARIS, LLC's written disclosure statement 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 ARIS, LLC shall disclose 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 ARIS, LLC's written disclosure statement at the time of the solicitation. In New Hampshire, any solicitor receiving a referral fee will be licensed.

Currently, ARIS, LLC IS NOT IN A referral fee relationship with a solicitor.

Item 15 **Custody**

ARIS, LLC does not have custody of client funds.

Item 16 Investment Discretion

Refer to Item 4 C “Advisory Business”.

Item 17 Voting Client Securities

ARIS, LLC does not accept authority for voting client securities.

Item 18 Financial Information

This is not applicable to ARIS, LLC.

Item 19 Requirements for State-Registered Advisers

***** NOTICE TO MASSACHUSETTS CLIENTS *****

A disciplinary history of ARIS, LLC or its representatives, if any, can be obtained by calling the Massachusetts Securities Division at (617) 727-3548. An Investment Adviser is forbidden from sharing any information about a Massachusetts client, which qualifies as private, unless the client specifically agrees thereto or “opts in” [see CMR 12.205(9)(c)13].

Part 2B of Form ADV: Brochure Supplement

Item 1 Cover Page

Joseph M Grella, MBA, CFP®

American Retirement & Investment Strategies, LLC

14 Fleetwood Drive
Gloucester, MA 01930

978-283-1011

This brochure supplement provides information about Joseph M. Grella that supplements the American Retirement & Investment Strategies, LLC brochure. You should have received a copy of that brochure. Please contact us at 978-283-1011 if you did not receive American Retirement & Investment Strategies, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph M. Grella is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

JOSEPH M. GRELLA, MBA, CFP®

Born 1958

CERTIFIED FINANCIAL PLANNER™

Post-Secondary Education:

Kaplan College, - 2003, Certified Financial Planner

Northeastern University - 1989, MBA, Finance

Bridgewater State University - 1980, BA, Communications

Recent Business Background:

American Retirement & Investment Strategies, LLC, Managing Member, 04/2006 - Present

Purshe Kaplan Sterling Investments, Registered Representative, 04/2006 - 12/2012

Smith Barney, Financial Advisor, 09/2003 - 04/2006

UBS Painewebber Inc., Financial Advisor, 07/2002 - 09/2003

CERTIFIED FINANCIAL PLANNER™ professional

Joseph M. Grella is a certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional and may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP®

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

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.

Item 3 Disciplinary Information

Mr. Grella does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Mr. Grella is a licensed insurance agent with various insurance companies.

Item 5 Additional Compensation

Mr. Grella, as a licensed insurance agent with various insurance companies, and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. However, Mr. Grella does not receive any additional compensation for providing advisory services beyond that received as a result of his capacity as Managing Member of American Retirement & Investment Strategies, LLC.

Item 6 Supervision

Mr. Grella is a Managing Member of American Retirement & Investment Strategies, LLC; therefore, supervision is not required.

Item 7 Requirements for State Registered Advisers

Mr. Grella, does not have, or has ever had, any reportable arbitration claims and has not been found liable in a reportable civil, self-regulatory organization proceeding or administrative proceeding. Mr. Grella has not been subject of a bankruptcy petition.

Part 2B of Form ADV: Brochure Supplement

Item 1 Cover Page

William D'Annibale, MBA, CETS™

American Retirement & Investment Strategies, LLC

8 Wildebrook Road
Medway, MA 02053

508-533-7370

This brochure supplement provides information about William D'Annibale that supplements the American Retirement & Investment Strategies, LLC brochure. You should have received a copy of that brochure. Please contact us at 978-283-1011 if you did not receive American Retirement & Investment Strategies, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about William D'Annibale is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

WILLIAM D'ANNIBALE

Born 1963

Certified Estate and Trust Specialist™

Post-Secondary Education:

Bentley College - 1993, MBA, International Finance

Babson College - 1990, BS, Investments and Finance

Recent Business Background:

American Retirement & Investment Strategies, LLC, Managing Member, 04/2006 - Present

Purshe Kaplan Sterling Investments, Registered Representative, 04/2006 - 12/2012

Smith Barney, Financial Advisor, 09/2003 - 04/2006

UBS Painewebber Inc., Financial Advisor, 08/2002 - 09/2003

Meridian Research, Vice President of Sales and Research, 09/2001 - 07/2002

EMC Corp., Vice President of Marketing, 10/1999 - 05/2001

Certified Estate and Trust Specialist™ (CES™) — Designation achieved from the Institute of Business and Finance (IBF) in 2019.

Item 3 Disciplinary Information

Mr. D'Annibale does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Mr. D'Annibale is a licensed insurance agent with various insurance companies.

Item 5 Additional Compensation

Mr. D'Annibale, as a licensed insurance agent with various insurance companies, and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. However, Mr. D'Annibale does not receive any additional compensation for providing advisory services beyond that received as a result of his capacity as Managing Member of American Retirement & Investment Strategies, LLC.

Item 6 Supervision

Mr. D'Annibale is a Managing Member and Chief Compliance Officer of American Retirement & Investment Strategies, LLC; therefore, supervision is not required.

Item 7 Requirements for State Registered Advisers

Mr. D'Annibale, does not have, or has ever had, any reportable arbitration claims and has not been found liable in a reportable civil, self-regulatory organization proceeding or administrative proceeding. Mr. D'Annibale has not been subject of a bankruptcy petition.

PRIVACY POLICY NOTICE

AMERICAN RETIREMENT & INVESTMENT STRATEGIES, LLC

American Retirement & Investment Strategies, LLC has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our clients to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive client, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Your Information

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic, and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

State Specific Regulations

In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations

Changes to our Privacy Policy or Relationship with You

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.