Firm Brochure
(Form ADV Part 2)

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This brochure provides information about the qualifications and business practices of Personal Asset Strategies, Inc. If you have any questions about the contents of this brochure, contact us at: 516.248.8811, or by email at: mail@pasfinance.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. Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about Personal Asset Strategies, Inc. is available on our website at www.pasfinance.com.

MAY, 2026

Material Changes

Annual Update

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

Material Changes since the Last Update

None

Firm Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 516.248.8811 or by email at: lonniegarber@pasfinance.com.

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Advisory Business

Firm Description

Personal Asset Strategies, Inc. ("PAS") was founded in 1991.

PAS was formed for the purpose of, and continues to specialize in, providing personal financial advisory services and the creation and management of individually designed investment portfolios. PAS creates sophisticated strategies geared toward maximizing wealth and attaining specific financial goals for each individual client. We tailor our services to the individual needs of each client within the parameters of each client's tolerance for risk, determined by an investment profile which we develop based upon our initial interview and subsequent discussions. All client assets are managed on a full discretionary basis with a view toward diversification based upon the client's investment profile. This means that we maintain full authority to determine which securities and amount of securities will be bought or sold, without prior client approval. Using our Collaborative Wealth Management approach, PAS serves as each client's financial manager to coordinate with other professionals (e.g., attorneys, accountants, insurance agents, etc.) on an as-needed basis.

Based upon the perceived risk tolerance and financial/investment objectives of each client, PAS invests client funds in diversified equities including common stock, preferred stock, mutual funds, REITS, medium and long term fixed income investments such as U.S. Government/Agency bonds, municipal bonds and corporate bonds, cash and cash equivalents, and pooled investment real estate CPG vehicles. PAS will, where appropriate, employ options strategies with a view toward increasing returns and for leverage and/or hedging. Interest rate sensitive instruments may be used to capture returns evolving from changing market/economic conditions. Non-standard assets and/or private placements may be employed where appropriate.

Lonnie M. Garber is the Managing Member of certain CPG Limited Liability Companies, each of which is a pooled investment vehicle for investment of client monies in singular real estate properties. From time to time, real estate investment opportunities arise which may be appropriate for certain qualified clients, taking into account, among other things, a client's need for income with a possibility of a capital gain, and tolerance for lack of liquidity. In such circumstances, PAS may recommend investment by a client in a CPG pooled investment vehicle.

PAS is a fee-only investment adviser which receives no commissions from any outside sources. We are not affiliated with any entities which sell financial products; nor do we receive any commissions in connection with the sale of such products. When unusual due diligence is required to evaluate a particular investment, PAS may receive reimbursement for expenses/time from the issuer of the investment.

Principal Owners

Lonnie M. Garber, CFP is the sole shareholder of PAS.

Type of Advisory Services

Serving as financial adviser to individuals, families, trusts and estates, we use a collaborative process to develop investment plans designed to enhance the financial lives of our clients. We frequently incorporate into our clients' investment portfolios, strategies culled from experts in related disciplines to effectively address such areas as:

- Tax reduction tailored to each client's overall circumstances, including non-managed assets. For example, investment portfolio design may sometimes be used as an offset to the specific tax implications of a client's business interests or the sale of real property;
- Investment portfolio account titling and division of assets among accounts to be consistent with a client's specific estate planning and other needs. Implementation of the technical instructions of estate planning or family law counsel, for example, is essential to ensure that legal planning comes to fruition as intended;
- Investment portfolio allocations that are structured to meet individual time horizons for cash flow, projected lifestyle changes, etc. and designed to take into account non-managed assets, such as business interests, unusual real and personal property, etc.;
- Investment portfolio arrangements that are consistent with Trust strategies to protect assets and meet the individual needs

of beneficiaries; and which incorporate unique considerations which affect a client's financial strategy, such as business succession planning, unusual family relationships, etc.

- Occasionally, Lonnie M. Garber may be designated by a client to serve as a Personal Representative, Trustee or Executrix of a Trust or Estate.

Types of Agreements

The following agreements define the typical client relationship:

Portfolio Management Agreement

This Agreement sets forth in detail the relationship between each client and PAS, including, among other things, management of accounts, periodic performance statements, fees charged, selection of broker-dealer, term of representation, etc.

Power of Attorney and Trading Authorization

This Agreement provides PAS with full authorization to manage the client's investments.

Investment Policy Statement

This Statement sets forth the financial/investment objectives of the client, level of risk tolerance, time horizon which may set specific goals, the anticipated overall portfolio structure and the amount of assets to be placed under management.

Termination of Agreement

The Portfolio Management Agreement may be terminated at any time by PAS or the client upon sixty (60) days' written notice.

Fees and Compensation

The specific manner in which fees are charged by PAS is established in the client's written Portfolio Management Agreement with PAS. Management fees are billed on a quarterly basis, in advance. A typical annual fee schedule may be up to 2% for management services for assets under management up to $2,000,000. The management fee for a standard account shall be a minimum of 1.5%. With respect to assets under management in excess of $2,000,000, a negotiated fee shall apply. Management fees are deducted from the client's management account pursuant to advance consent by the client. An initial fee of 1.5 percent of assets under management, or part thereof, is charged to evaluate the new client's existing investments, develop the Investment Policy Statement and redesign the new client's portfolio and includes transfer and set-up of the new portfolio investments. There is a flat fee of $25 per brokerage account quarterly for compliance and record keeping relating to SEC and other regulatory requirements. In addition, an annual flat fee of two tenths of one percent shall be charged for expenses incurred in connection with all managed accounts, regardless of how invested, including most brokerage transaction costs, overnight delivery and other postage/delivery expenses, wire transfer fees, copying and printing expenses, long distance telephone charges and basic consultation fees which PAS may incur with other professionals (such as a CPA or Attorney) on behalf of a client ("Additional Expenses"), all of which shall be paid directly by PAS. The flat fee is an estimate and may not be equivalent to the exact Additional Expenses incurred. By way of example, a retainer agreement may provide as follows:

> The annual fee schedule shall be 2% for Investment Advisory Services for assets up to $2,000,000 and 1.5% for assets above that amount. The foregoing schedule shall be applied based upon the value of the total assets under management including cash and the value of short securities and margined investments. In addition, an annual flat fee of two tenths of one percent shall be charged for expenses incurred in connection with managed accounts, including most brokerage transaction costs (not including SEC activation fees, fees charged by custodial financial firms in connection with private placement investments in which the client has elected to participate, or account maintenance fees, if any), overnight delivery and other postage/delivery expenses, wire transfer fees, copying and printing expenses, long distance telephone charges and basic consultation fees which PAS may incur with other professionals (such as a CPA or Attorney) on a client's behalf ("Additional Expenses"), all of which shall be paid directly by PAS. The flat fee is an estimate and may not be equivalent to the exact Additional Expenses incurred. For Commercial Property Group ("CPG") and other alternative investments, if any, the fee is calculated based on the value of your original investment adjusted to reflect return of capital and distributions. Fluctuations in market value of the underlying CPG assets will not be calculated or used to adjust fees. The fee for Advisory Services plus the fee for Additional Expenses shall be payable quarterly in advance, and shall be calculated by multiplying the value of the assets under management, including the value of short securities and margined investments by .0055 for assets up to $2,000,000 and by .0043 for assets in excess of that amount. You agree to authorize the financial institution(s) holding the portfolio to promptly disburse this sum when requested to do so in writing by PAS.

The usual rate for a complex financial plan or other special financial services outside the scope of usual investment management is $325 per hour, for management or non-management clients. PAS will, however, discuss and agree in advance with clients as to the fee to be charged for such services.

Notwithstanding the above, clients may incur certain charges imposed by custodians and broker-dealers, such as transfer taxes, SEC activation fees, and other fees and taxes on brokerage accounts. Mutual funds and exchange traded funds may also charge internal management fees, which may or may not be disclosed in the particular fund's prospectus. In addition, pooled investment vehicles in which qualified clients may invest to participate in real estate investment properties from time to time ("CPG Vehicles") may be charged due diligence fees, setup fees, management fees and reimbursement of expenses by PAS. Expense reimbursement may be charged on an estimated basis to cover office and other expenses related to the CPG Vehicles, and there is no guaranty that the amount charged will be more or less than the expenses actually incurred. Such charges, fees and commissions are exclusive of and in addition to the fees charged by PAS for management services, transfer and set-up, and expenses covered by the flat fee of two tenths of one percent as described above.

Performance-Based Fees and Side-By-Side Management

PAS does not accept performance-based fees.

Trustee, Executrix and Personal Representative Fees

In instances where Lonnie M. Garber serves as a Trustee, Executrix or Personal Representative of a Trust or Estate, Ms. Garber acts as an individual independent of PAS and charges separately for her services at the rate of $325 per hour in jurisdictions which authorize hourly rate fees, and/or the statutory percentage rates promulgated by the respective jurisdiction(s).

Types of Clients

PAS's clientele consists substantially of high net worth individuals, families, Trusts and religious institutions.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

PAS performs a detailed analysis of the securities it believes may be suitable for acquisition by a client. PAS may review information obtained from various resources, including multiple editions of Value Line, Morningstar, TC2000, CNBC, Standard & Poors, and various financial magazines and reporting services. In addition, PAS may review corporate activity of the targeted security, corporate rating services, annual reports, press releases, prospectuses, filings with the Securities and Exchange Commission, etc.

Investment Strategies

Management of PAS accounts focuses on the identification and continual improvement of an individually designed portfolio which includes stocks within selected sectors that are anticipated to provide desired returns in terms of growth and income. Changes will be introduced to the portfolio to incorporate changing trends and take advantage of evolving market conditions. While value is a consideration, our high net worth investors also benefit from appropriate participation in current and emerging trends to increase overall returns. Leveraging techniques appropriate for high net worth investors, such as the use of covered and uncovered options, may be employed. Fixed income instruments may be used for income or to capture growth opportunities evolving from interest rate fluctuations and other market factors.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:

- 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.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as 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.

- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- 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.

- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of unprofitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

- Political Risk: Changes in government, laws, foreign and domestic policy changes, both nationally and internationally can impact on the performance of investments.

Investing in securities involves risk of loss. PAS neither represents nor guarantees that our services, strategies or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Disciplinary Information

PAS has been providing investment advisory services since 1991. Neither PAS nor any of our employees or associated persons has been involved in any disciplinary events or proceedings.

Other Financial Industry Activities and Affiliations

Lonnie M. Garber, President of PAS, also serves, from time to time, as Managing Member of certain limited liability companies established to invest in commercial real estate ventures ("CPG Vehicles"). In addition, Ms. Garber also serves, from time to time, as the Trustee of various Trusts established by certain clients of PAS.

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

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Code of Ethics

The employees of PAS have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

PAS and its employees may buy or sell securities that are also recommended to and/or held by clients. Employees may not trade their own securities ahead of client trades. Neither PAS nor any associated person has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Inasmuch as Mr. Garber is the Chief Compliance Officer of PAS and the husband of Ms. Garber, Mr. Garber has designated Melissa C. Quiroz as the monitor to review personal securities transactions traded by Ms. Garber.

Personal Trading

The Chief Compliance Officer of PAS is Jeffrey B. Garber, Esq. He reviews all employees' trades.

Brokerage Practices

We have established our own trading platform and custodial services at LPL Financial and its affiliates ("LPL"), a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. The factors which we consider in recommending LPL or any other broker-dealer to you include the financial strength of the company, reputation, execution, pricing, research and service. LPL affords us access to cutting edge research materials to supplement our own direct research and service subscriptions which include, among others, industry leaders such as Value Line, and Morningstar. We require that all custodial firms with whom we place accounts be appropriately insured.

We recognize our duty to obtain "best execution" through LPL or any other broker-dealer. In seeking "best execution", we are concerned that the specific transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including, among other things, execution capability, commission rates, and responsiveness.

LPL provides us with duplicate client confirmations and statements, access to an exclusive trading desk, access to block trading which provides us with the ability to aggregate securities transactions and then allocate appropriate shares to our individual client's accounts, etc. In fulfilling our duties to you, we seek at all times to put your interests first.

Review of Accounts

Every client account is reviewed on a daily basis for accuracy of balances, trades, disbursements and other financial activity. PAS uses state-of-the-art software and daily information downloads through Advent to reconcile every holding on a daily basis. In addition, account structure is reviewed on an ongoing basis by Lonnie M. Garber, President and Chief Analyst. Conditions which may trigger specific account reviews are new investment information, changes in tax laws and changes in a client's personal situation. When reviewing a client's portfolio, we take into account the client's current security positions in light of the current investment objectives of the client.

In addition to statements and transaction confirmations provided directly to them by LPL, clients receive quarterly performance updates and additional written updates from PAS, where warranted, which may include a performance summary and a summary of objectives and progress toward meeting objectives.

Client Referrals and Other Compensation

PAS often receives client referrals from existing clients and professionals in various disciplines. PAS does not accept or offer referral fees or any form of remuneration to or from other professionals when a prospect or client is referred to or by PAS.

Custody

Except as otherwise stated herein, PAS does not have physical custody of any funds or securities of clients. Client funds and securities are held primarily at LPL, Equity Institutional, and also at other banks, broker-dealers or other independent, qualified custodians ("Custodian") from time to time. Our clients receive account statements from Custodians at least quarterly and frequently on a monthly basis, setting forth their positions and transactions pertaining to their accounts. We ask that our clients regularly review Custodian account statements for accuracy.

From time to time, PAS learns of potential investments in commercial real estate which may be suitable for some of the clients of PAS. On those occasions, PAS may arrange for the organization of a limited liability company ("Commercial Property Group" or "CPG" or "CPG Vehicle") into which clients may elect to deposit monies for purposes of investing in the commercial real estate. CPG investments are recommended to clients with an acceptable level of risk tolerance, who can tolerate lack of liquidity, and might benefit from an opportunity, not guaranteed, to receive income and possible growth. The CPG LLC organized for this purpose is managed by a separate management LLC of which Lonnie M. Garber is the Member-Manager. The clients' CPG LLC membership certificates are custodied at Equity Institutional. Inasmuch as PAS facilitates (i) the movement of client funds from client managed brokerage accounts into CPG LLCs to invest in commercial real estate, and (ii) the collection of monthly distributions for deposit into client accounts, PAS is deemed to have custody of the monies used for that purpose. Clients receive statements at least quarterly reflecting the status of their interests in the CPG LLCs.

Lonnie M. Garber has served as Trustee of certain revocable and irrevocable trusts established by clients from time to time. As Ms. Garber is empowered by the Trust instruments to manage, invest, pay taxes and expenses, and distribute the trust funds to trust beneficiaries, she, and therefore PAS, are deemed to have custody of those trust funds. Beneficiaries of these trusts receive statements at least quarterly reflecting the status of the monies held in the trusts.

Accordingly, pursuant to SEC rules, PAS and/or Ms. Garber are deemed to have access to, or custody, of client funds in said CPG Vehicles and Trusts. Therefore, PAS has contracted with Liebman Goldberg & Hymowitz, an accounting firm which is a member of the Public Company Accounting Oversight Board ("PCAOB"), to conduct annual audits of the financial records of the above mentioned CPG Vehicles and Trusts and report to the SEC, as required.

Pursuant to our Portfolio Management Agreement, the Custodian will directly debit your account for the payment of our advisory fees. Your Custodian account statements will reflect the amount of our advisory fees as deducted from your account each quarter.

Investment Discretion

When a client signs our Portfolio Management Agreement, Power of Attorney and Trading Authorization form, the client grants PAS full discretion over the selection and amount of securities to be purchased or sold for the account.

Voting Client Securities

PAS does not vote proxies related to securities held by clients. Clients are expected to vote their own proxies.

Financial Information

PAS does not have any financial condition or impairment which would prevent us from meeting our contractual commitments to clients. We do not take physical custody of client funds or securities. We are not required to include a financial statement with this brochure.

Business Continuity Plan

PAS has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space and communications.

The Business Continuity Plan covers natural disasters, such as hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event and Internet outage. Electronic files are backed up daily and archived.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

PAS maintains a security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

This privacy policy explains the manner in which PAS collects, utilizes and maintains nonpublic personal information about clients, as required by Federal legislation.

PAS collects personal information about clients mainly through the following sources - (1) Account applications, interviews and documents provided by the client in writing, in person, by telephone, electronically or by any other means. This information includes (1) name, address, nationality, tax identification number, and financial and investment qualifications; and (2) transactions including account balances, investments and withdrawals.

PAS does not sell or rent client information. PAS does not disclose nonpublic personal information about clients to non affiliated third parties or to affiliated entities, except as permitted by law. For example, PAS may share nonpublic personal information in the following situations: (1) to service providers when authorized, which may include attorneys, accountants and other professionals; (2) to respond to a subpoena or court order, judicial process or regulatory authorities; (3) to protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities; and (4) upon consent of a client to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the client.

PAS has a policy that requires all employees, financial professionals and companies providing services on its behalf to keep client information confidential.

PAS maintains safeguards that comply with federal standards to protect client information. PAS restricts access to the personal and account information of clients to those employees who need to know that information in the course of their job responsibilities. Third parties with whom PAS shares client information must agree to follow appropriate standards of security and confidentiality.

This privacy policy applies to both current and former clients. PAS may disclose nonpublic personal information about a former client to the same extent as for a current client.

PAS may make changes to its privacy policy in the future. No changes affecting clients will be made without first sending clients a revised privacy policy describing the change.

Brokerage Account Documents

PAS instructs LPL and Equity Institutional and/or other Brokerage Firms at which our clients maintain Accounts to send original Statements and transaction information to the account owner and to provide duplicates to PAS. Transaction confirmations provide details of all trades in client accounts. This information is repeated in the Brokerage Statements generated by the Brokerage Firm. PAS suggests that clients maintain in their files all Brokerage Statements. Transaction confirmations may be discarded because the information is duplicated in Brokerage statements. Clients should note that most statements are generated by the Brokerage Firms on a monthly basis; however, certain accounts may receive statements quarterly or only when activity has taken place.

Account Values

Account values in PAS Quarterly Reports are based upon the combined values of your managed Brokerage Accounts at the close of markets on the day prior to the date a PAS statement is calculated, including cash and the value of short securities and margin balances. Real Estate Investment values are carried forward from your original investment and the ultimate market value will vary based upon the date of sale of the underlying property and/or owner entity. Value has not been adjusted to reflect return of capital or distributions.

Tax Reporting

As a courtesy to our clients and their CPA's, PAS may provide cost basis, realized gain/ loss and income/ expense information. PAS maintains and compiles this data for investment analysis and not tax reporting purposes and it must be reconciled to 1099s and other tax reporting information provided by the Brokerage Firms which custody the accounts. PAS schedules should never be attached to tax returns.

EXECUTIVES OF THE FIRM

Lonnie M. Garber, CFP, President, has headed the Investment Management team for PAS since its inception. She attended New York University and has obtained advanced certificates in Financial Management areas. She has been licensed since 1992 as a Certified Financial Planner (CFP) by the International Board of Standards and Practices of Financial Planners. As a continuing requirement to her licensure, Ms. Garber adheres to the Board's code of ethics and meets continuing education requirements.

Ms. Garber is a member of the international Financial Planning Associates (FPA).

Ms. Garber has been a member of the Long Island Cabinet for State of Israel Bonds and was an honoree of that organization in 2000. She also served on the Advisory Board of the Holocaust Memorial and Tolerance Center of Nassau County.

Jeffrey B. Garber, Esq., Secretary and General Counsel, is a graduate of Tufts University and New York University School of Law and has been a practicing attorney in the State of New York since 1970. Mr. Garber is the Chief Compliance Officer of PAS and heads its alternative investment division: the Commercial Property Group.

Mr. Garber serves as Coordinator for clients with their private counsel on estate planning and other legal issues. He also coordinates with outside professionals as to pension, IRA and retirement issues with respect to tax sheltering requirements, accumulation/distribution arrangements and maximization of tax benefits available under applicable rules.

Mr. Garber has been a member of the American Bar Association, Nassau County Bar Association, Estate Planning Council of Nassau County and Financial Planning Association (FPA).As a long-time Family Law Practitioner in the State of New York, Mr. Garber has planned, organized, moderated and lectured at continuing legal education programs and seminars in the field of Family Law. His expertise in this area and experience in trust and estate planning and administration provide the basis for his unique perspective on financial planning.

Mr. Garber is the husband of Ms. Garber, as well as legal counsel to the CPG Vehicles. This potential conflict of interest is highlighted in the Operating Agreements of the CPG Vehicles, as amended.

Amanda Jones, Esq. Vice President/ Director of New Jersey Region, is a graduate of New York University and Rutgers University School of Law. Ms. Jones has consulted with PAS since 1996 as an Assistant Portfolio Manager, has participated in portfolio construction and management of portfolios and providing securities and sector analysis. As an experienced attorney, Ms. Jones advises clients about complex estate and tax planning issues and works directly with clients' private counsel to execute plans. She is the founder of Divorce Strategies, LLC and has extensive experience working with families in transition on financial planning issues. Ms. Jones has been a Member of the American, New Jersey and the Essex County Bar Associations. She has served her local community on the Recycling and Reclamation Committee and the Budget Task Force Committee.

Melissa C. Quiroz, Operations Manager, is a graduate of St. John's University and has been with the firm since 2006. She leads day-to-day operational activities, insuring that transactions run efficiently and smoothly and meet our service excellence standards. She handles the opening and technical maintenance of client accounts, tracking of funds/ securities received and disbursed, maintenance of tax reporting data and overall document management. Mrs. Quiroz also supports the compliance requirements of the firm.