



## **PART 2A APPENDIX OF FORM ADV**

### **CIG Asset Management, Inc.**

**May 1, 2011**

This wrap fee program brochure provides information about the qualifications and business practices of CIG Asset Management, Inc. If you have any questions about the contents of this Brochure, please contact us at (248) 827-1010. 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 CIG Asset Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Please note that references to CIG Asset Management, Inc. as a "registered investment adviser" or descriptions of the firm as being "registered" do not imply a certain level of skill or training.

## **SUMMARY OF MATERIAL CHANGES**

In the future this Section will provide you with a summary of any material changes from the date of our last Brochure. At that time, we will also reference the date of our last annual update of our Brochure. This Section is a new requirement under the “Amendments to Form ADV” which was published by the SEC on July 28, 2010. This Brochure dated May 1, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Brochure is materially different in structure and requires certain new information that we were not required to include in our previous wrap fee program brochure. As such, we recommend that clients read our entire Brochure.

In the past we offered to deliver or have delivered information about our qualifications and business practices to clients on at least an annual basis. As required by the new SEC rules, we will ensure that clients receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary, including a new Brochure based on changes or new information, at any time, without charge.

You may request a copy of our Brochure contacting Kimberlee Levy, our Chief Compliance Officer, at (248) 827-1010 or [klevy@cigcorporation.com](mailto:klevy@cigcorporation.com).

Additional information about us is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s website also provides information about any persons affiliated with us who are registered, or are required to be registered, as one of our investment adviser representatives.

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## **SERVICES, FEES AND COMPENSATION**

### ***Our Services***

We sponsor the Wealth Management wrap fee program, also known as the Program, which is a fee-only investment advisory program, offered on a discretionary basis. If you participate in the Program, we charge you a single specified fee to cover all costs in connection with securities transactions in your account, our investment management services, custody and related services.

Prior to joining the Program, you execute an investment advisory agreement with us setting forth the terms and conditions of our management of your investments within the Program. When you become a client, we will ask you to complete a confidential, in-depth questionnaire called a Client Profile. Our advisory representatives, whom we refer to as our wealth managers, use your answers to understand your financial objectives and goals, establish your tolerance to risk, and identify your most comfortable style of management. Our wealth managers use the Client Profile to design and manage a tailored portfolio for you within the Program. Within your Client Profile, you may also indicate any special instructions or limits that you wish us to follow in managing your assets.

Our wealth managers use the Program to implement investment management and asset allocation plans for you and our other clients. Our Program includes four asset allocation models as follows:

- CIG Capital Vantage seeks a balanced approach utilizing investments mainly in exchange traded funds (ETFs);
- CIG Capital Investment, which seeks capital appreciate using ETFs;
- CIG Wealth Vantage seeks a balanced approach utilizing investments in ETFs and income producing limited partnerships;
- CIG Dynamic Opportunities seeks a balanced approach utilizing ETFs, income producing limited partnerships and hedge funds.

Our wealth managers recommend an appropriate portfolio allocation for your account based upon the information you provide to us in your Client Profile. In managing your overall portfolio, the wealth manager utilizes a strategic allocation approach and formalizes this into a strategic model allocation according to your risk profile. In addition to the core strategic allocation, our recommended strategy will, from time-to-time, employ tactical repositioning of the domestic equity portion of your portfolio in accordance to our dynamic equity asset modeling. The specific percentages allocated to each asset class may vary from client to client

due to the nature of asset performance, the investment management model selected and the investment objectives and risk tolerance of each client.

Some strategies may also use options as a way to hedge equity exposure and reduce overall risk to the portfolio. Based on your individual investment objectives, we may honor special requests to utilize available mutual funds, ETFs and/or other securities, as well as investment research and sub-advisers beyond the ETFs recommended in our allocation model.

Generally, we only offer our Program for accounts larger than \$125,000. You must participate in our Wealth Management program if you want to invest in accordance with our investment models under our Program.

### ***Our Fees***

Although we may negotiate our fee under certain circumstances, our standard (tiered) fee schedule for the Program is:

<u>Assets Under Management</u>	<u>Initial Annual Fee*</u>
First \$250,000	2.5%*
Next \$250,000	2.0%
Next \$250,000	1.8%
Next \$250,000	1.5%
Next \$500,000	1.0%
Any amount over \$1,500,000	0.8%

\*\$250 monthly fee on first \$125,000

As previously stated, we charge a single wrap fee for our Program. We charge our fee based on a percentage of the market value of the average daily balance of all your assets under our management in the Program during each advisory billing fee period. We disclose your specific fee in your investment advisory agreement with us. We may negotiate our standard fee schedule and minimum account sizes under certain circumstances. If you negotiate a flat fee schedule, you may or may not pay a higher fee than those who pay under a tiered schedule, depending on your asset levels.

For example, assuming that you have \$1,000,000 in assets under our management, your annual fee would be 1.950% or \$19,500. . Similarly, if you have \$5,000,000 in assets under management, your annual fee would be 1.050% or \$52,500. We could calculate your fees as follows:

	<u>Asset Amount</u>	<u>Multiplied by Tier Percentage</u>	<u>Equals Fee</u>		<u>Asset Amount</u>	<u>Multiplied by Tier Percentage</u>	<u>Equals Fee</u>
	\$ 250,000	2.5%	\$ 6,250		\$ 250,000	2.5%	\$ 6,250
	250,000	2.0%	5,000		250,000	2.0%	5,000
	250,000	1.8%	4,500		250,000	1.8%	4,500
	<u>250,000</u>	1.5%	<u>3,750</u>		<u>250,000</u>	1.5%	<u>3,750</u>
Total Annual:	\$1,000,000		\$19,500		\$5,000,000		\$52,500

Keep in mind, however, that we charge your actual fees either quarterly or monthly and take into account changes in your daily balance.

### ***Method of Payment***

We bill our fee for the Program either quarterly or monthly, in advance as specified in your investment advisory agreement with us. Your fees accrue on a daily basis based on the value of the assets in the account at the close of trading each day in the previous month or quarter. You will also be billed for deposits made to your account during the advisory fee period; however, no adjustments will be made to your bill for monies withdrawn. In any partial advisory fee cycle, we prorate the fee based on the number of days the assets are under our management during the particular period. You may request that related accounts be combined in order to meet fee break points and reduce the advisory fee charged. We reserve the right to waive our fee for certain accounts such as employee accounts and personal accounts of solicitors who refer business to us.

In each year, other than the first year of your annuity policies, we will include the market value of your annuity policies in the calculation of our management fee. We will, however, deduct from our fee, any trailing commission that we or one of our affiliates, may receive with respect to your annuities.

If you authorize us, we direct the custodian of your account to deduct all our fees for the Program directly from your account. Your custodian will automatically deduct our fees at the beginning of the month or quarter, as applicable. At the end of the month, we reconcile all assets held with other third party custodians, but which are included under our management, and we instruct your custodian to deduct our additional fee. We reconcile these amounts quarterly against the average daily assets under our management during the applicable month or quarter.

Our fee includes such services as portfolio management (stock, bond and mutual fund analysis, market analysis, asset allocation decisions, etc.), execution of various securities (mutual funds, ETFs, stocks, bonds, etc.), the custodian's periodic reports, account servicing, and continuous account management. Participation in the Program may cost you more or less than purchasing these services separately. The portfolio size and amount, number of transactions made in your account, as well as the commissions charged for each transaction, will determine the relative cost of the Program versus paying for executions on a per transaction basis and paying a separate fee for advisory services. Our fee may be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

### ***Other Fees***

In addition to our fee for the Program, your investments in our Program may also be subject to other fees and charges imposed by other third parties, but will not include things like commissions on trades and custodial account fees.

### ***Termination***

Either of us may terminate our investment advisory agreement by providing the other party with written notice. Your death, disability or incompetence will not terminate or change the terms of the investment advisory agreement. However, your executor, guardian, attorney-in-fact or other authorized representative may terminate our investment advisory agreement with you by providing us with proper written notice. Termination will not affect (i) the validity of any action we previously took under the investment advisory agreement; (ii) liabilities or obligations of the parties from transactions initiated before termination; or (iii) your obligation to pay our fees already incurred. **Upon termination, we prorate your fee through the date of termination and refund you any remaining balance, as appropriate.**

### ***Commissions and Mark Ups***

We are affiliated with CIG Securities, Inc., a broker-dealer and member of FINRA. We also have an affiliate, CIG Risk Management, Inc., which is a licensed insurance agency. Our principal executive officers and other related employees are officers, managers, and/or, the case of CIG Securities, registered representatives and, in the case of CIG Risk Management, licensed insurance agents, of these affiliates. CIG Securities and these individuals, as registered representatives of CIG Securities, may effect limited securities transactions for our advisory clients and receive customary compensation for some of these transactions. If you participate in our Program, payment of commissions for certain non-traded limited partnership will not increase the fee that you pay. Your fee will be the same whether we use our related broker-dealer or an unrelated broker-dealer to effect transactions in your account. If you engage us for additional advisory services outside of the Program, and you buy an insurance product from CIG Risk Management, CIG Risk Management and/or its agents will receive commission on such

sale. In order to mitigate any potential conflict which would exist when we recommend you purchase insurance products, we waive our investment advisory fee on the assets invested in an insurance product for the first year. After the first year, we will charge an investment advisory fee on the management of your assets invested in an insurance product but we will reduce your advisory fee by the amount of any trailing commission that CIG Risk Management receives with respect to your assets.

### **ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

We offer our Program to individuals, employee benefit plans, trusts, estates, charitable organizations, corporations and other business entities. Generally, we require you to have a minimum account value of \$125,000 to open an account in the Program.

### **PORTFOLIO MANAGER SELECTION AND EVALUATION**

#### ***Advisory Business***

As previously stated, we are the sponsor and portfolio manager of the Program. In addition to sponsoring and managing the Program, we also offer subadvisory service and serve as an investment manager for the pooled investment vehicles or funds. For additional information regarding these services, the pooled investment vehicles or funds, and our fees, contact Kimberlee Levy, our Chief Compliance Officer, at (248) 827-1010 or [klevy@cigcorporation.com](mailto:klevy@cigcorporation.com) to receive a copy of Part 2A of our Form ADV.

#### ***Performance-Based Fees and Side-By-Side Management***

While, we do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets) on accounts invested in the Program, we do manage two hedge funds for which we may charge performance-based fees named CIG CAM, LP and CIG PlenaStrategy Fund. CIG Partners, LLC, an affiliate of CIGAM, is the general partner of both CIG CAM and CIG PlenaStrategy, and, as such, receives performance based fees. We also receive a fee for managing the assets based on the amount of assets invested in the fund, known as a management fee.

For the CIG CAM fund, if the fund outperforms a certain benchmark, CIG Partners receives an annual performance management fee equal to 20% of each investor's, also called a limited partner, net profits in the fund. For CIG PlenaStrategy Fund, CIG Partners' annual performance fee is equal to 10% of each limited partner's net profits in the fund. However, both of these performance fees are subject to what is called a "high water mark," which means that CIG Partners only receives a performance fee on increases in the net asset value of the limited partner's account in excess of the highest net asset value the account previously reached. Therefore, if the limited partner has a net loss in a fiscal year, that loss is recorded and carried forward to future fiscal years. Once those losses are recovered, CIG Partners will

earn a performance fee, but only on profits in excess of the highest net asset value the account previously reached.

Performance-based fee arrangements may create an incentive for us to recommend investments that may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. We utilize an investment review committee consisting of executive management, the senior portfolio manager and the chief compliance officer to help ensure that recommendations are suitable for investors. We also consult with outside counsel when we feel we may have a conflict of interest arise. We have retained outside counsel on behalf of our investors to provide guidance, as well as outside counsel for our Funds and for the Investment Adviser to help us resolve any conflicts within the confines of the law and operating agreements.

### ***Methods of Analysis, Investment Strategies and Risk of Loss***

#### ***Methods of Analysis***

We utilize fundamental analysis to evaluate investments. Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic well-being of a financial entity as opposed to only its price movements. When conducting fundamental analysis, we will review a company's financial statements and consider factors including, but not limited to, whether the company's revenue is growing, if the company is profitable, if the company is in a strong enough position to beat its competitors in the future, and if the company is able to repay its debts. Because it can take a long time for a company's value to be reflected in the market, the risk associated with this method of analysis is that a gain is not realized until the stock's market price rises to the company's true value.

The valuation method is a technique used to calculate a theoretical value for a security in order to estimate potential future market prices. When utilizing the valuation method, we will review such things as a security's earnings per share, price to earnings and growth rate.

We also utilize technical analysis to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the stock's price movement in the market. Charting is a form of technical analysis in which the various technical factors are diagrammed in order to illustrate patterns. Technical analysis studies the supply and demand in the market in an attempt to determine what direction, or trend, will continue in the future. However, there are risks involved with this method, including the risk that the trends will change unpredictably, which is why we use a combination of methods and obtain information from a variety of sources.

We obtain information from a number of sources, both public and by purchase, including financial newspapers and magazines, inspections of corporate activities, research

materials prepared by third-parties, corporate rating services, annual reports, prospectuses and filings with the SEC and company press releases. We believe these resources for information are reliable and regularly depend on these resources for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information.

### *Investment Strategies*

The Program is a strategy in which your assets will be invested in ETFs, individual securities and/or mutual funds in accordance with an asset allocation that we design and manage. For your overall portfolio, we utilize a strategic allocation approach, which we formalize into a strategic model allocation according to your Client Profile. In addition to the core strategic allocation the strategy will, from time-to-time, employ tactical repositioning of the domestic equity portion of the portfolio in accordance to our dynamic equity asset modeling. Some strategies may also employ the use of options as a way to hedge equity exposure and reduce overall risk to the portfolio. Based on your individual investment objectives, we may honor special requests regarding available mutual funds, ETFs and/or other securities to be utilized as well as investment research and sub-advisers.

Your portfolio allocation will be based on your individual characteristics as determined from your Client Profile.

We manage assets in our Program, at least in part, utilizing a strategic allocation approach that seeks to target long-term exposure to a set of non-correlated asset classes based on the tenants of modern portfolio theory which is anticipated to provide an optimal level of diversification over the long term. The resulting long-term target allocation has been formalized into a strategic model allocation according to a client's risk profile. Tactical changes may also be made within the domestic equity portion of the portfolio which involves the rotation of domestic equity exposure among the four major styles of equity investment: large cap value, large cap growth, small cap growth and small cap value to reflect current economic conditions and asset class return assumptions in accordance to the firm's dynamic equity asset modeling.

Some strategies may also use options as a way to hedge equity exposure and reduce overall risk to the portfolio during times of high risk-to-reward periods determined by an in-house model. Instead of varying equity exposure when we believe the market presents more risk than reward, we will maintain the stated level of equity exposure determined by the strategic allocation model and limit risk (i.e. exposure) through the purchase of put options. The strategy calls for the purchase of puts on the S&P 500 Index (or S&P 500 Index ETFs) with an expiration two months out from when the signal was generated. The strike prices will be determined by our model, but will generally be several percentage points (2-3%) out-of-the-money (an option with no monetary value if it expired today). The amount of exposure we

intend to hedge using this strategy will also be determined by our models, but will generally range from 50-100%.

We will still utilize our four equity style allocation rotation model [Russell 1000 (large) Value or Growth and Russell 2000 (small) Value or Growth Indexes] to gain exposure to domestic equities, but use S&P 500 derivatives as a proxy for hedging our equity exposure. We do this for two reasons: First, for liquidity because options contracts on the Russell 1000 Value and Growth Indexes and Russell 2000 Value and Growth Indexes are too thinly traded to effectively hedge all of the equity exposure within managed accounts. S&P 500 Index options, however, are more heavily traded and, therefore, we feel they can more adequately address our current and expected future needs. Second, most of our market timing models and our benchmarking have been back-tested, filtered and based on the subsequent performance of the S&P 500, making it a more appropriate proxy when we hedge exposure against “market” declines.

We seek to invest our asset allocation strategies in the asset classes exhibiting the best characteristics for sustained market leadership and overweight or underweight asset classes in accordance with your Client Profile.

#### *Risk of Loss*

Overall, investing in securities involves risk of loss that you should be prepared to bear. Obtaining higher rates of return on investments typically entails accepting higher levels of risk. For example, limited partnerships generally have the highest risk, but also the highest potential rate of return but the highest risk. We work with you to attempt to identify the balance of risks and returns that is appropriate and comfortable for you. However, it is still your responsibility to ask questions if you do not fully understand the risks associated with any investment or investment strategy.

Also, while we strive to render our best judgment on your behalf, many economic and market variables beyond our control can affect the performance of your investments and we cannot assure you that your investments will be profitable or assure you that no losses will occur in your investment portfolio. Past performance is one relatively important consideration with respect to any investment or investment advisor, but it is not a predictor of future performance.

Exchange-Traded Funds and Mutual Funds. Mutual funds (which are not used in advisory accounts) and ETFs typically charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees will generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. ETFs generally have lower fees than mutual funds, however, these

separate fees and expenses are disclosed in each fund's current prospectus, which is available from the fund or we can provide it to you upon request.

Consequently, for any type of fund investment, it is important for you to understand that you are directly and indirectly paying two levels of advisory fees and expenses: one layer of fees at the fund level and one layer of advisory fees and expenses to us.

Variable Insurance Products. Variable insurance products can be highly complex financial products that are offered by insurance companies. Investment in a variable policy is subject to both general market risk and the insurance company's credit risk. These and other risks are described in the variable policies prospectuses. Variable products are regulated under both securities and insurance laws and related rules and regulations. Variable products offer various benefits and features that may or may not have value to you depending on your circumstances, which we can discuss with you. Like other types of investments, commissions are paid for the purchase of variable products and there may be substantial surrender charges. These commissions, surrender charges, and other expenses are disclosed in the prospectus.

Like mutual funds, insurance companies charge a variety of fees and charges against the assets invested in the separate accounts of their policy holders. As noted above, this means that there may be two layers of advisory fees paid – one layer to the insurance company and one layer to our firm for our advisory services. In each year, other than the first year of your annuity policies, we will include the market value of your annuity variable insurance policies in the calculation of our management fee. We will, however, deduct from our fee, any trailing commission that we, or one of our affiliates, may receive with respect to your annuities.

### ***Voting Client Securities***

We do not receive proxies for securities held in client accounts. Unless otherwise agreed in writing, it is our policy not to vote, nor give any advice regarding how to vote, proxies for securities held in your accounts. Proxies for securities held in your accounts will be received by you directly from the custodian of your assets, or will be handled as otherwise agreed between you and the custodian.

### **CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

As the portfolio managers of our Program, our wealth managers have access to all of the information you provide to us, including your financial information. Our firm has adopted a Privacy Policy, in accordance with Regulation S-P under section 504 of the Gramm-Leach-Bliley Act, which restricts our firm and wealth managers' use of and access to your nonpublic personal information. Our wealth managers have access to your information on an as needed basis in order to service your needs under the Program. In order for us and our wealth managers to effectively manage your account and assist you in meeting your financial objectives, you must update us as soon as possible when any changes to your personal or financial information

occur. You may obtain a complete copy of our Privacy Policy by contacting Kimberlee Levy, our Chief Compliance Officer, at (248) 827-1010 or [klevy@cigcorporation.com](mailto:klevy@cigcorporation.com).

### **CLIENT CONTACT WITH PORTFOLIO MANAGERS**

We are open Monday through Thursday from 9 a.m. to 5:30 p.m. and Friday from 9 a.m. to 5:00 p.m. There are no restrictions on when you may contact or consult with us or our wealth managers regarding the Program or your account.

### **ADDITIONAL INFORMATION**

#### ***Disciplinary Information***

As a registered investment adviser, we must inform you of all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of our firm or the integrity of our management. We have no legal or disciplinary events to disclose.

#### ***Other Financial Industry Activities and Affiliations***

##### ***Our Affiliated Broker Dealer***

We are under common control and ownership, and therefore affiliated with, CIG Securities, Inc., a FINRA member registered broker dealer. Osman R. Minkara is the Chief Executive Officer of both our firm and CIG Securities, and sole owner by virtue of his ownership in our parent company CIG Corp. Osman R. Minkara, our Chief Executive Officer, Richard Gonzales, Chief Operating Officer, David Martin, Vice President and Senior Portfolio Manager, and Kimberlee Levy, our Chief Compliance Officer are all registered representatives of CIG Securities, and as such they will be able to effect limited securities transactions on your behalf.

##### ***Relationships or Arrangements Material to Advisory Business***

When persons associated with us effect securities transactions as registered representatives of CIG Securities, CIG Securities may receive separate and customary compensation for this activity and may pay a portion of the compensation to these individuals. In some circumstances, CIG Securities may receive customary compensation from mutual fund companies, variable annuity companies or other similar products, including 12b-1 fees, for performing certain administrative and/or shareholder servicing related tasks associated with our client's investments in such securities. CIG Securities' securities business is primarily limited to mutual fund shares, exchange traded funds and variable insurance contracts. Both our firm and CIG Securities are wholly owned subsidiaries of CIG Corp. We recommend CIG Securities to our clients for brokerage services. This creates a potential conflict of interest. However, your participation in our Program mitigates this conflict because you pay the same fee regardless of the number of transactions.

### *Our Pooled Investment Vehicles*

As described in more detail in Part 2A of our Form ADV, we are also an investment manager for the pooled investment vehicles or funds. We or the general managers of the funds receive payment of a percentage of assets invested in these pooled vehicles or performance fees based on the performance of the assets invested in the pooled vehicle.

Each of the pooled investment vehicles are formed as a limited liability company or limited partnership. The general partner or managing member of each fund is responsible for the management of the fund. Either we or one of our affiliates acts as the general partner or managing member of each of the funds. The performance of the management functions may present conflicts of interest. We, along with our affiliates who are acting as the manager of the funds, will attempt to resolve these conflicts of interest in a manner consistent with their fiduciary duties to the respective entities with which they are affiliated.

### *Affiliations with Accountants and Lawyers*

We are not affiliated with any third party accounting firms or law firms. However, our Controller, Lisa Rich, is a Certified Public Accountant and our Chief Compliance Officer, Kimberlee Levy, is licensed to practice law in the state of Michigan. Neither Ms. Rich nor Ms. Levy is permitted to provide services to anyone other than us, and therefore we do not believe this creates a conflict of interest.

### *Our Affiliated Insurance Agency*

We are under common ownership and control with CIG Risk Management, Inc., a licensed insurance agency. Our principal executive officers and other related employees are officers, managers, and/or licensed insurance agents of CIG Risk Management. These individuals may sell life and disability insurance policies to you separate from the Program. In that event, CIG Risk Management receives a separate and customary compensation for the sale of insurance and may pay a portion of the compensation to the licensed insurance agent who is also our employee. This creates a conflict of interest because premiums on insurance policies are generally higher in the first year than investment advisory fees for the same level of assets. We mitigate this potential conflict by not requiring you to use an affiliated insurance agent, and you are free to purchase any recommended insurance products from an unaffiliated insurance agent. CIG Risk Management is also a wholly owned subsidiary of CIG Corp, our parent corporation.

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

We have adopted a joint code of ethics along with its parent holding company, CIG Corp. and CIG Securities, our affiliated broker/dealer (the "Code") in compliance with Rule 204A-1 of the Investment Advisers Act of 1940. The Code establishes rules of conduct for our

employees, and is designed to, among other things; govern personal securities trading activities in the accounts of our employees. The Code contains general ethical principles and personal securities reporting provisions for our employees. In summary, the Code prohibits our employees from taking inappropriate advantage of their positions and the access to information concerning the investments or investment intentions of our clients, or their ability to influence such investment intentions, for personal gain or in a manner detrimental to the interests of its clients. Rule 204A-1 makes it unlawful for our employees to engage in conduct which is deceitful, fraudulent, or manipulative, or which involve false or misleading statements, in connection with the purchase or sale of securities. The Code acknowledges the general principles that we, along with our employees, (1) owe a fiduciary obligation to its clients; (2) have the duty at all times to place the interests of their clients first (3) must conduct all personal securities transactions in such a manner as to avoid any actual or potential conflict of interest or abuse of an individual's position of trust and responsibility; (4) should not take inappropriate advantage of their positions in relation to client accounts; (5) must comply with the federal securities laws; and (6) must safeguard nonpublic information.

### ***Additional Procedures***

In addition to our Code, we have adopted the following provisions to handle conflicts of interest:

1. We maintain records of all securities holdings for our clients, our self, our employees and affiliated parties. These holdings are reviewed on a regular basis by our compliance personnel.
2. No individual shall cause or attempt to cause any of our clients to purchase, sell or hold any interest in a security in a manner calculated to create any personal benefit or benefit any employee account. None of our officers or employees shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public upon reasonable inquiry.
3. We require our employees to submit quarterly reports, and acknowledge the firm's policies and procedures with respect to the Code on an annual basis.
4. Our compliance personnel review each employee's personal trading accounts on a regular basis.
5. Any employee not in observance of the above may be subject to disciplinary action, and possible termination.
6. We advise you in your agreements with us, and in the applicable investment service descriptions, of the possible use of our pooled investment vehicles or pooled investment vehicles for which we provide services or in which we have a

financial interest. You may at any time, instruct us not to use affiliated funds in your account.

You may request a copy of our Code by contacting Kimberlee Levy, our Chief Compliance Officer, at (248) 827-1010 or [klevy@cigcorporation.com](mailto:klevy@cigcorporation.com).

### ***Review of Accounts***

#### *Account Reviews*

We review your account on a regular basis. However, we may conduct more frequent reviews upon unusual market conditions, a change in your personal or financial circumstances, or your request. Wealth managers are responsible for reviewing your account. Our Chief Executive Officer also initiates random reviews for proper suitability.

Our senior portfolio manager reviews each strategy, the relative strength, momentum and price movement of each asset class and the allocations in your portfolio to ensure the allocations are weighted to best meet your individual risk tolerances and objectives. We also conduct an analysis of economic indicators on a daily basis. If these economic indicators determine that major allocation movements may be necessary, we consult with our risk management committee to review recommendations for approval.

We ask you, at least annually, to meet with your wealth manager. Together, you and the wealth manager determine whether a change in your objectives warrants a change in the criteria used to manage your assets. If the information is current, no further action is required. If any information has changed, you must promptly advise us of any changes.

We facilitate our account review through an arrangement with Albridge Solutions ("Albridge"). We have engaged Albridge to provide certain "back office" systems that enable us to gather and aggregate client data from multiple platforms and providers, maintain portfolio models, review models and accounts for variances, analyze account performance, generate quarterly statements and other reports, facilitate the trading of client accounts and make information available online, in a secure manner, to you, your financial representatives and your supervising broker-dealers or soliciting investment advisory firms.

#### *Client Reports*

Your custodian will send you a statement, at least quarterly, identifying the amount of funds and of each security in your account at the end of the reporting period and setting forth all transactions in your account during the reporting period. We also make various reports and quarterly performance evaluations accessible to you electronically via secure internet access. Upon your request, we may also provide you with a mailed copy of your quarterly statements and reports. As stated in our investment advisory agreement, you agree to carefully review any

statements and reports we provide to you and notify us within 30 days of your receipt should you have any concerns regarding such statements or reports or note any discrepancies.

***Client Referrals and Compensation***

We do not provide or receive an economic benefit for referrals for providing investment advice or other advisory services to our clients. We do not directly or indirectly compensate any person who is not a supervised person for client referrals.

***Financial Information***

As a registered investment adviser, we must provide you with certain financial information or disclosures about our financial condition if we have financial commitments that impair our ability to meet contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding and do not have any financial commitments that would impair our ability to meet any contractual or fiduciary commitments to you.

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