

# Disclosure Brochure

March 28, 2012

## **Advanced Quantitative Consulting, LLC**

*a Registered Investment Adviser*

One Tower Bridge, 100 Front Street, Suite 1111  
W. Conshohocken, Pennsylvania 19428

(610) 341-3900

This brochure provides information about the qualifications and business practices of Advanced Quantitative Consulting, LLC (hereinafter "AQC" or the "firm"). If you have any questions about the contents of this brochure, please contact Dr. Christopher C. Geczy, Ph.D. at (610) 341-3900. 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 Advanced Quantitative Consulting, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Advanced Quantitative Consulting, LLC is an SEC registered investment adviser. Registration does not imply any level of skill or training.

## **Item 2. Material Changes**

This Item discusses only the material changes that have occurred since AQC's last annual update dated May 3, 2011. AQC does not have any material changes to disclose in this item.

## Item 3. Table of Contents

Item 1.	Cover Page .....	i
Item 2.	Material Changes .....	ii
Item 3.	Table of Contents .....	iii
Item 4.	Advisory Business .....	4
Item 5.	Fees and Compensation .....	5
Item 6.	Performance-Based Fees and Side-by-Side Management .....	6
Item 7.	Types of Clients.....	6
Item 8.	Methods of Analysis, Investment Strategies and Risk of Loss .....	6
Item 9.	Disciplinary Information.....	7
Item 10.	Other Financial Industry Activities and Affiliations .....	7
Item 11.	Code of Ethics .....	8
Item 12.	Brokerage Practices .....	9
Item 13.	Review of Accounts.....	9
Item 14.	Client Referrals and Other Compensation .....	9
Item 15.	Custody .....	10
Item 16.	Investment Discretion.....	10
Item 17.	Voting Client Securities .....	10
Item 18.	Financial Information .....	10

## Item 4. Advisory Business

AQC has been in business as an SEC registered investment adviser since May 27, 2010. The principal owners of the firm are Dr. Jeffrey Jaffe, Ph.D. and Forefront Analytics, LLC ("*Forefront*"), an affiliated advisory firm owned predominantly by Dr. Christopher C. Geczy, Ph.D. AQC focuses on providing consulting services and asset allocation recommendations to clients, which include registered investment advisers, corporations, and business entities. AQC does not currently manage client assets in a discretionary manner. However, the firm does provide investment advice and consulting services to certain institutional clients that manage investment portfolios with assets in excess of \$7.0 billion (collectively, "assets under advisement").

Prior to engaging AQC to provide any of the foregoing investment advisory services, the client is required to enter into one or more agreements with AQC setting forth the terms and conditions under which AQC renders its services (collectively the "*Agreement*").

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

### **Consulting and Advisory Services**

---

AQC offers consulting and advisory services to two clients. The firm provides one client with asset allocation recommendations and the other client with reviews and discussions on academic articles and publications, as described below.

As part of this offering, AQC's two clients may engage the firm to perform portfolio analyses and provide recommendations of appropriate asset allocation models. Any recommendations are rendered on a fully non-discretionary basis and implementation of such is left entirely to the discretion of the client. AQC may also provide institutional asset managers with analyses of academic research papers or other analytical functions pertaining to asset allocation methodologies or other related topics that fall within the parameters of a particular engagement.

As a general matter, AQC's institutional consulting and advisory services are specialized engagements individually negotiated with each institution based upon their specific needs. AQC's institutional consulting services are generally not available to retail advisory clientele, but rather address fundamental issues affecting various institutions within AQC's area of concentration.

As referenced above, AQC had assets under advisement in excess of \$7.0 billion as March 21, 2011. While AQC does not manage these assets directly, the firm does provide these institutional clients with ongoing advisory services and corresponding asset allocation recommendations, among other functions.

In performing its services, AQC is not 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. The client is under no obligation to act upon any of the recommendations made by AQC under a consulting engagement or to engage the services of any such recommended professional, including AQC itself. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of AQC's recommendations. Clients are advised that it remains their responsibility to promptly notify AQC if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising AQC's previous recommendations and/or services.

### Item 5. Fees and Compensation

AQC offers its services on a fee basis, which may include monthly fixed fees, as well as fees based on a percentage of the assets under the firm's advisement.

#### Consulting and Advisory Fees

---

AQC provides summaries of academic articles to an advisory firm for a fixed monthly fee, which generally ranges from \$2,000 to \$5,000 per month, based upon the scope of a particular engagement.

When engaged to provide ongoing asset allocation recommendations, the firm does so for an annual fee – generally between one and five basis points (i.e., 0.01% to 0.05%) – as determined by the amount of assets under advisement. The annual fee is prorated and charged monthly, in arrears, based upon the average daily market value of the assets on which the firm advises.

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

AQC provides all clients with an invoice for payment in advance of the respective due date. AQC does not debit fees from its clients' accounts.

#### Fees Charged by Financial Institutions

---

Clients may incur all charges imposed by the *Financial Institutions* (as defined below) and other third parties such as brokerage commissions, transaction fees, custodial fees, charges imposed directly by a mutual fund or ETF in the account, which are 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.

*Financial institutions* include, but are not limited to, any other broker-dealer, trust companies, banks, etc. used by the client to custody the assets that AQC is engaged to advise upon.

## **Fees for Management During Partial Months of Service**

---

For the initial period of advisory services, the fees are calculated on a *pro rata* basis.

The *Agreement* between AQC and its clients continues in effect for the period specified in the *Agreement* or until otherwise terminated by either party pursuant to the terms of the *Agreement*.

Fees based upon assets under advisement are calculated pursuant to average daily market value. As such, these fees are necessarily adjusted to reflect fluctuations in the value of its clients' investment portfolios during a billing period.

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

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

## **Item 7. Types of Clients**

AQC provides its services to two other registered investment advisers.

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

### **Methods of Analysis and Investment Strategies**

---

AQC provides asset allocation weight recommendations to one client on an annual basis. In order to arrive at these long-term weights across asset classes – e.g., equities, fixed income, commodities, and alternative investments – the firm utilizes a combination of quantitative analysis techniques and qualitative subjective inputs. These weights are generally constructed for long-term investors with time horizons of 20 years or greater.

One primary risk in relying on quantitative analyses derived in part from historical data is that any such analysis may not help to predict performance in the future. Even if predicted trends will eventually reoccur, there is no guarantee that AQC will be able to accurately predict such a reoccurrence.

## Risks of Loss

---

### *Market Risks*

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

### *General Risk of Loss*

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

## Item 9. Disciplinary Information

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

## Item 10. Other Financial Industry Activities and Affiliations

### **Affiliated Investment Advisers**

---

AQC is under common control with its affiliated SEC registered investment advisers, GKFO, LLC ("*GKFO*") and Forefront Analytics, LLC ("*Forefront*") (collectively, the "*Advisory Affiliates*"). Certain of AQC's Principals and/or *Supervised Persons* also serve in the same or similar capacities for *Forefront* and/or *GKFO*. AQC and the *Advisory Affiliates* all share the same principal place of business. AQC does not recommend the services of its *Advisory Affiliates* to advisory clients and, as such, no conflict of interest exists under the circumstances.

### **Affiliated Collective Investment Vehicle**

---

*Forefront* serves as the general partner and portfolio manager of the Forefront Dynamic Strategies Fund, L.P. (the "*Private Fund*"). There may exist a conflict of interest to the extent that AQC recommends an investment in the *Private Fund* and certain of AQC's Principals and/or *Supervised Persons* receive compensation by virtue of their positions therewith.

### **Affiliated Consulting Firm**

---

One of AQC's Principals, Dr. Geczy, is also an owner and consultant of PPB Advisors ("*PPB*"). *PPB* does not provide services to AQC's advisory client and, as such, this affiliation does not present a conflict of interest.

## Other Outside Consulting Activities

---

AQC's Principals, Dr. Geczy and Dr. Jaffe, as well as other officers and employees of AQC or its affiliates, may engage in outside consulting activities relating to the investment management industry. For example, they may provide consulting services to other investment advisers or managers of alternative investments. They also may provide litigation consulting or expert witness services relating to disputes involving investment management services, alternative investments and other areas. In some cases, they may provide these services to clients who either manage or are affiliated with persons who manage alternative investments that AQC has recommended to its clients or might in the future recommend to its clients. Accordingly, these outside consulting services could give rise to a conflict of interest when AQC recommends investment in, or invests client assets in, alternative investments that are managed by a person who pays Dr. Geczy, Dr. Jaffe or another AQC employee for consulting, expert or other services. It is the policy of AQC to at all times put the interests of its client first. Accordingly, AQC makes investment decisions for clients without regard to whether Dr. Geczy, Dr. Jaffe or any other employee of AQC receives compensation from a third party for providing consulting, expert or other services.

## Other Principal Business

---

AQC's Principals, Dr. Jaffe and Dr. Geczy, serve as Associate Professor of Finance and Adjunct Associate Professor of Finance, respectively, at The Wharton School, University of Pennsylvania. These are the principal businesses of Dr. Jaffe and Dr. Geczy, as they devote approximately sixty percent (60%) of their time to their academic responsibilities. AQC does not believe these relationships raise any potential conflicts of interest.

## Item 11. Code of Ethics

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

AQC has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*"). In accordance with Section 204A of the Investment Advisers Act of 1940 (the "Advisers Act"), its *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by AQC or any of its associated persons. The *Code of Ethics* also requires that certain of AQC's personnel (called "*Access Persons*") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Unless specifically permitted in AQC's *Code of Ethics*, none of AQC's *Access Persons* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same



household as the *Access Person*) any transactions in a security which is actively being recommended for purchase or sale, or is being considered for purchase or sale, on behalf of any of AQC's clients.

In the unlikely event that AQC is recommending or considering recommending a specific security to a client, no *Access 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, in the unlikely event that AQC is recommending a client sell or considering recommending a client sell sale of a specific security on behalf of a client, no *Access 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. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact AQC to request a copy of its *Code of Ethics*.

### **Item 12. Brokerage Practices**

AQC is required to describe the firm's practices with regard to broker-dealer recommendations and execution of client transactions. AQC does not recommend a broker-dealer for client transactions and does not execute transactions on behalf of clients and therefore has nothing further to disclose in response to this Item.

### **Item 13. Review of Accounts**

For the client to which AQC provides recommendations of asset allocation models, one or more of AQC's investment adviser representatives review and/or reassess those models as agreed upon with the client. Such clients also receive reports from AQC as set forth in the *Agreement* or as otherwise agreed upon in writing by AQC.

### **Item 14. Client Referrals and Other Compensation**

AQC is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, AQC is required to disclose any direct or indirect compensation that it provides for client referrals. The firm has no disclosures pursuant to this Item.

## Item 15. Custody

AQC does not maintain custody of client funds or securities.

## Item 16. Investment Discretion

AQC is required to disclose if it accepts discretionary authority to manage securities accounts on behalf of clients. AQC is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. AQC does not exercise discretion on behalf of clients.

## Item 17. Voting Client Securities

AQC is required to disclose if it accepts authority to vote client securities. AQC does not vote client securities on behalf of its clients. Clients receive proxies directly from the *Financial Institutions*.

## Item 18. Financial Information

AQC is not required to disclose any financial information pursuant to this Item due to the following:

- The firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance;
- The firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The firm has not been the subject of a bankruptcy petition at any time during the past ten years.

## **Advanced Quantitative Consulting, LLC**

*a Registered Investment Adviser*

One Tower Bridge, 100 Front Street, Suite 1111  
W. Conshohocken, Pennsylvania 19428

(610) 341-3900

Prepared by:

