

**SEC NO. 801-70356**

**March 28, 2013**

**Solamere Advisors  
Part 2A of Form ADV**

**Firm Brochure**

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This Firm Brochure provides information about the qualifications and business practices of CAMG Solamere Management, LLC, which does business as Solamere Advisors. If you have any questions about the contents of this Brochure, please contact us at 704-547-3100, and/or [brp@solamereadvisors.com](mailto:brp@solamereadvisors.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 Solamere Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Material Changes

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There are no material changes since our last brochure dated March 29, 2012. We have however changed custodians from Pershing LLC to Fidelity Investments for our client accounts.

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Our Brochure may be requested by contacting us, at the numbers above.

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

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# **Advisory Business**

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## **Firm Description**

Founded in 2009, Solamere Advisors is an SEC-registered investment advisor which provides personalized investment management and advice, and financial planning to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Clients should understand that registration does not imply a certain level of skill or training. Solamere Advisors' services may include definition of financial goals and objectives, identification of financial challenges, investment management and/or advice, cash flow management, tax planning, insurance review, and education, retirement and estate planning.

Solamere Advisors is strictly a fee-only investment advisory and financial planning firm.

The principal owners of Solamere Advisors are CAMG Solamere, LLC and Charlotte Asset Management Group, LLC.

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## **Advisory Services**

Solamere Advisors provides both discretionary and non-discretionary advisory services. Solamere Advisors' services are based upon the individual needs and desires of the Client. Where the Firm provides ongoing investment management or advice, it works with the Client to identify his/her goals and objectives. Where it has investment discretion, Solamere Advisors invests and reinvests the account assets in accordance with the Client's investment objectives. Where it does not have discretion, the Firm advises the client on strategies, portfolio allocations and individual securities, which the Client may or may not follow in his/her discretion. Through the Investment Advisory Agreement (the "Agreement"), any investment policy statement or other acceptable written directive, a Client may impose reasonable restrictions on investments in certain securities or types of securities. Utilizing the information provided by the Client, Solamere Advisors will manage the account or advise the Client, as applicable, in a manner designed to achieve the stated objectives.

As of December 31, 2012, Solamere Advisors managed \$220,288,085 on a discretionary basis and \$21,500,367 on a non-discretionary basis.

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## **Financial Planning**

Solamere Advisors also provides Clients with a broad range of comprehensive financial planning and consulting services (including investment and non-investment related matters). Information used for financial planning is obtained through personal Client interviews, encompassing such matters as the Client's current financial status, future goals and needs, and risk tolerance. Additional information is gathered from the Client through a questionnaire and through any additional documentation provided by the Client. In performing its services, Solamere Advisors is not required to verify any information received from the Client or from the Client's other professionals, and is expressly authorized to rely on the information as delivered.

To engage Solamere Advisors to provide financial planning services, Clients are required to sign an engagement letter (the "Engagement Letter") setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and establishing the total financial planning fee and payment schedule.

The Client retains absolute discretion over all decisions to implement a financial plan, and is free to accept or reject any such recommendation. Clients are not required to use Solamere Advisors' services in implementing the plan.

## **Fees and Compensation**

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### **Compensation**

In standard advisory accounts, Clients pay asset-based fees for advice and/or investment management services. Solamere Advisors' general fees are set forth in the Fee Schedule below (the "Fee" or "Fees") and represent the Firm's standard annual rates. Fees may be negotiated and may differ from Client to Client based on a number of factors such as assets to be managed, related accounts, and account composition. Any variation from the standard rates will be set forth in the Client's Investment Advisory Agreement (the "Agreement").

The Fee is assessed monthly or quarterly in advance, as specified by the Client's Agreement. The Fee is calculated on the total market value of the account assets as valued by the custodian as of the last business day of the previous calendar month or quarter (as applicable), or at the time the account is funded. Fees are calculated using an incremental approach. The Fee charged at account inception is prorated to capture the number of days remaining in the calendar quarter. If an account is terminated for any reason, the Client will be entitled to a refund of any pre-paid monthly or quarterly Fee, prorated by the days remaining in the calendar month or quarter after termination.

Where applicable, the asset values will be determined based on the trade date, rather than the settlement date, of transactions. The asset values and the account value used for the Fee calculation may differ from the values shown on account statements due to settlement-date accounting, the treatment of accrued income, distributions and/or necessary adjustments.

#### **Fee Schedule**

0 - \$5,000,000	1.25%
Above \$5,000,000	1.00%

The Fee covers Solamere Advisors' and any sub-advisor's investment management services. Clients will additionally incur brokerage and transaction charges, plus certain other charges imposed by third parties. Such third party charges may include custodial fees; charges imposed directly by a mutual fund, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses); charges imposed directly by an ETF or ETN; certain deferred sales charges on previously-purchased mutual funds;

transfer taxes; wire transfer and electronic fund fees; termination fees; IRA and similar fees; and taxes. (See "Other Fees," below.)

Under the standard Agreement, the Fee will be paid by the custodian to Solamere Advisors or its designee(s) from the relevant account (or from such other account with custodian as Client directs). The custodian will provide the Client with at least quarterly statements showing all disbursements from the account(s), including payments of Fees.

Clients will pay the public offering price on any securities purchased in a distribution from an underwriter or syndicate member, which will generally include distribution compensation to the underwriter or dealer. Similarly, in securities transactions with dealers acting on a principal basis, the price paid by Clients will generally include a mark-up or mark-down to the dealer. Solamere Advisors does not receive any portion of such distribution compensation, mark-ups or mark-downs.

Solamere Advisors' officers and employees (collectively, "Associates"), including those recommending the Firm's services to Clients, are compensated in part based on the Fees. This compensation may be more than an Associate would receive if the Client participated in other programs. An Associate may therefore have a financial incentive to recommend the Firm's services over other services or programs.

In addition to ongoing investment management or advice, Solamere Advisors may provide specific investment services, generally limited in scope or time, for a negotiated fee. Fees for such limited engagements will be negotiated on an hourly or flat fee basis, and will be memorialized in a retainer agreement executed by the Client (the "Retainer Agreement").

Financial planning fees are determined based upon the scope and complexity of the contemplated plan, the Client's net worth, the areas or issues to be addressed and other factors unique to each Client's circumstances. Financial planning fees generally range from \$1000 to \$10,000 for a full financial plan, but may be higher in special circumstances. The relevant fee will be included in the Engagement Letter, and will be paid upon execution of the Engagement Letter or upon such other terms as agreed by the Firm. Any follow-up or implementation services on a financial plan will be separately billed on a negotiated basis. Where the Client has an existing investment management relationship with the Firm, under certain circumstances financial planning services may be provided at no additional charge.

Any Client who does not receive a copy of Solamere Advisors' current Form ADV Part 2A Firm Brochure forty-eight (48) hours prior to the date of entering into the Agreement, Retainer Agreement or Engagement Letter may terminate that relationship, without penalty, within five (5) business days of its execution. Any Client terminating the Agreement under this provision will be responsible for transactions executed prior to Solamere Advisors' receipt of a written termination notice. Otherwise, the Agreement or Letter will continue in effect until terminated by either Solamere Advisors or the Client by thirty (30) days' written notice to the other. Upon any termination, pre-paid but unearned Fees will be refunded on a pro-rata basis, based upon the remaining days in

the relevant month or quarter. Unearned fees paid under a Retainer Agreement or Engagement letter will be refunded on based on the percentage of work performed on the defined project prior to the Firm's receipt of the termination notice. Clients are responsible for Fees until the last day of services rendered by Solamere Advisors. Clients will bear any termination fees imposed by any relevant custodian.

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**Other Fees**

Client assets are held in brokerage or other custodial accounts. Broker-dealers and custodians charge account fees, commissions, and other transaction fees for effecting account services and/or securities transactions, which may include transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. On mutual fund investments, Clients may also pay charges at the fund level (e.g. management fees and other fund expenses). Mutual funds generally charge investors 12b-1 fees. Solamere Advisors does not receive 12b-1 fees on mutual fund shares held in Client accounts. The amount of these 12b-1 fees is included among normal mutual fund expenses. Such 12b-1 fees do not offset or reduce Solamere Advisors' Fee. Other third party managers also generally charge a management fee for their services. The fees and expenses charged by mutual funds and third party managers are set forth in the relevant prospectus or manager's disclosure brochure.

All such brokerage, custodial, mutual fund and third party manager fees and expenses are in addition to the Solamere Advisors Fee. Solamere Advisors factors these additional fees and expenses into its management and advice, however.

Solamere Advisors also sponsors a Wrap Account in which investment management fees and certain brokerage fees and expenses are included within a "wrap fee." If a Wrap Account is available and suitable for a Client's portfolio, the terms and conditions of that account will be established in a Wrap Investment Advisory Agreement with the Client. A Wrap Fee Brochure containing additional information will be given to any Client participating in the program in addition to this Brochure.

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**Performance-Based Fees and Side-by-Side Management**

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**Sharing of Capital Gains**

Solamere Advisors' Fees are not based on a share of the Client's capital gains or appreciation. The Firm believes that performance-based fees present a conflict of interest, creating an incentive for advisers to recommend or use investments carrying higher risks in an effort to capture higher returns.

## **Types of Clients**

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### **Clients**

Solamere Advisors generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

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### **Account Minimums**

Solamere Advisors requires a minimum investment of \$1 million to open an account, although Solamere Advisors may in its discretion accept an account with a lower initial value. Clients may open an account with cash or, in the sole discretion of Solamere Advisors, with securities.

To the extent Clients fund their account through securities, some and possibly all of the transferred securities may be liquidated ("Liquidation Trades") upon or shortly after receipt by the custodian. The Liquidation Trades are necessary to ensure that the securities are consistent with the relevant investment strategy. Solamere Advisors does not consider the tax consequences of any Liquidation Trades, and does not warrant or represent that Liquidation Trades will always achieve best execution. Clients may incur adverse tax consequences in connection with these Liquidation Trades, and should consult their tax advisor prior to transferring any securities into a Solamere Advisors account.

If the value of an account falls below the applicable minimum, the Client may be required to: (a) make an additional deposit to restore the account to the required minimum value; (b) terminate the account; or (c) obtain Solamere Advisors' agreement to continue to manage the assets. Otherwise, Solamere Advisors may in its discretion terminate the account.

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

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### **Analysis**

Solamere Advisors designs and manages portfolios based on the Client's objectives and risk tolerance. In portfolio design, an early determination is the allocation between fixed income and growth strategies. Generally, Clients who seek lower returns and/or have a lower risk tolerance will receive a higher fixed income allocation, and Clients who seek higher returns and have a higher risk tolerance will be weighed more heavily in growth strategies.

### **Fixed Income**

Solamere Advisors employs a variety of methodologies and resources in determining the specific strategies and securities to be used in a Client's fixed income allocation. These resources include (but are not limited) to Bloomberg Professional Services, Morningstar, MPI Stylus, industry contacts, and third party research. Security selection focuses on the potential benefits versus identifiable risks.

## Growth Strategies

As with fixed income, Solamere Advisors uses a variety of third party resources in the selection and implementation of growth strategies, including Bloomberg Professional Services, Morningstar and MPI Stylus. Where appropriate, the Firm additionally uses due diligence reports on third party managers. In the Equity Trend and Hard Asset Trend strategies, discussed more fully below, the Firm uses a proprietary methodology based upon data provided by Bloomberg Professional Services. These strategies rely primarily on technical analysis. In selecting third party managers for Core Hedge and Core Alternative allocations, also discussed below, Solamere Advisors performs a qualitative assessment of the manager (both firm and, where appropriate, responsible individual), philosophy and investment process, together with a quantitative analysis, which may include historical risk-adjusted returns (Sharpe, Sortino, and Calmar ratios), rolling period performance (consistency), fees, and maximum drawdown.

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## **Investment Strategies**

Fixed Income allocations are primarily intended to dampen volatility through diversification. The allocation may include individual bonds, exchange traded funds ("ETF") mutual funds, and where appropriate, limited partnerships, exchange traded notes ("ETNs"), and closed-end funds. While Solamere Advisors maintains a bias for higher quality and lower duration bond exposures in the portfolio, the Firm also aims to be opportunistic where market conditions and Client mandates allow. The overall goal is to maximize risk-adjusted total return.

Growth allocations are designed to offer competitive returns with a goal of minimizing principal declines. While Solamere Advisors may employ more traditional strategies, its growth allocation portfolios generally include one or more of the following strategies, each employed in an effort to minimize principal loss associated with declining equity markets. Adopting multiple strategies additionally provides a diversification of asset class exposures.

Using ETFs, the Equity Trend strategy invests through the global equity markets when price trends are favorable, with a transition to cash when trends deteriorate. Solamere Advisors separately manages each participating Client's Equity Trend portfolio. The price trends of each portfolio's targeted securities are monitored daily using a proprietary methodology. Each security is evaluated independently as a buy or a sell, resulting in daily cash allocations of 0% to 100%.

The Hard Asset Trend strategy provides exposure to commodities and real estate investment trusts when price trends are favorable, with a transition to cash when trends deteriorate. Using primarily ETFs, Solamere Advisors separately manages each participating portfolio. Again, the price trends of each portfolio's targeted securities are monitored daily using a proprietary methodology. Each security is evaluated independently as a buy or a sell, resulting in daily cash allocations of 0% to 100%.

The Core Hedge strategy seeks a "hedged" exposure to global markets. The focus of the strategy is to benefit from active management by a diversified basket of managers, who generally possess more investment flexibility than traditional managers.

The Core Alternatives strategy provides participation in global markets through global macro managers and managed futures managers. The strategy offers the potential of returns that are less dependent upon rising markets. A Core Alternatives allocation may include both long and short exposures to currencies, commodities, interest rates, and equity market indices.

The Minimum Volatility strategy seeks to garner exposure to global markets utilizing a blend of both passive and active funds. The portfolio aims to benefit from the targeted lower volatility strategies targeted by these funds.

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**Risk of Loss**

All investments carry a risk of loss. Each strategy employed by Solamere Advisors carries this general risk; the discussions below identify some specific risks associated with certain strategies used by the Firm. A Client should carefully consider these facts before investing. Such a discussion cannot be complete, however, as there are always potential risks which can not be reasonably foreseen.

Fixed Income - Risks include interest rate risk (higher future interest rates may negatively affect future prices), duration risk (the longer the maturity/duration, the greater the interest rate risk), credit risk (the ability of the issuer to make principal and interest payments), liquidity risk (the likelihood that the security may be sold on a timely basis at a reasonable price), and spread risk (the attractiveness of the debt security vs other securities in the same and other classifications).

Equity Trend and Hard Asset Trend - Risks include the potential high execution/trading costs, and liquidity and tracking error risks associated with ETFs (discussed more fully in the relevant ETF's offering documents).

Core Alternatives and Core Hedge - Risks include those inherent in the complex investment strategy(s) employed by the relevant third party manager, including those associated with leverage through derivatives such as options, swaps, and futures. These risks are discussed in greater detail in the offering documents associated with the relevant security.

## **Disciplinary Information**

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**Legal or Disciplinary Events**

There are no reportable legal or disciplinary events for Solamere Advisors or its management.

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

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**Financial Industry Activities/ Affiliations**

CAMG Solamere, LLC is affiliated with Solamere Capital, LLC, an SEC registered investment advisor through common control. CAMG Solamere, LLC owns more than 50% of Solamere Advisors and the majority owners also own Solamere Capital, LLC.

Solamere Advisors may recommend Solamere Capital investments to their client and this may cause a conflict of interest but Solamere Advisors is bound by their fiduciary duty to their clients and are guided by what is in the best interest of their clients.

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

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### **Code of Ethics**

Solamere Advisors' Associates must comply with the Firm's Code of Ethics, which establishes standards of business conduct and, to an extent, compliance procedures for the Associates. These standards and procedures are based upon fundamental principles of openness, integrity, honesty and trust, and upon the laws applicable to Solamere Advisors' business and Associates. The firm will provide a copy of its Code of Ethics to any Client or prospective client upon written request. In accordance with Section 204A of the Investment Advisers Act of 1940 and its Code of Ethics, Solamere Advisors also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Firm or any Associate.

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### **Personal Trading**

Solamere Advisors and/or its Associates may invest in the same or related securities that it recommends to, or purchases or sells for, Clients. Solamere Advisors has policies and procedures reasonably designed to ensure that Client transactions are executed before any competing Solamere Advisors or Associate trades, and that the Firm and its Associates do not wrongfully deprive Clients of investment opportunities or benefits. Solamere's policies prohibit Associates from buying or selling securities before or contemporaneously with Client transactions in the security, except as may be permitted in aggregated trades. Where Solamere Advisors manages an Associate's portfolio, all purchases and sales on behalf of the Associate's account will be at the least favorable price for all contemporaneous trades, except as may be permitted in aggregated trades. As same-day mutual fund purchases and sales occur at the same purchase or sales price, the Firm does not prohibit its Associates or related parties from trading in those investments. Neither Solamere Advisors nor its Associates will seek or use inside information on securities for their own benefit or the benefit of any Client.

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## **Brokerage Practices**

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### **Brokerage Firms and "Best Execution"**

Solamere Advisors generally recommends that Clients open a custodial account with Fidelity Investments. Solamere Advisors has considered historical relationships, financial strength, reputation, execution capabilities, pricing, research and services. Although Solamere Advisors will always seek the "best execution" for clients, Fidelity Investments' commissions and/or transaction fees may be higher than would be charged by another custodian where the Firm determines, in good faith that Fidelity

Investments' commission/transaction fee is reasonable in light of the quality and value of the custodial and other services received. The determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution taking into consideration the full range of services, including the value of research provided, execution capability, commission rates, and responsiveness. While Solamere Advisors will seek competitive rates, therefore, it may not obtain the lowest possible commission rates.

Client may direct Solamere Advisors to use a different broker/dealer to execute some or all transactions for the client's account(s) (subject to the Firm's right to terminate the Agreement). In those situations, the Client will negotiate the terms and commissions for the account with the directed broker/dealer, and Solamere Advisors will not seek better execution services or prices from other broker/dealers. As a result, the Client may obtain less favorable pricing on commissions and/or transaction fees.

All brokerage commissions and/or transaction charges are exclusive of, and in addition to, Solamere Advisors' Fee. Solamere Advisors does not receive or share in any brokerage commissions or transaction charges, regardless of the broker/dealer used.

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### **Order Aggregation**

Where the same security will be bought or sold for multiple Clients at approximately the same time, Solamere Advisors may (but is not required to) "aggregate" or "batch" the orders to obtain "best execution", to negotiate more favorable commission rates and/or to allocate the resulting prices equitably among the Clients through an average cost basis. When aggregated, transaction costs or proceeds will be averaged and allocated among the Client accounts in proportion to the relevant purchase or sale orders executed on any given day. Solamere Advisors may include Associate transactions in these aggregated orders. All aggregated orders will comply with applicable regulatory directives and/or guidance. Solamere Advisors will not receive any additional compensation or remuneration as a result of aggregated trades. Aggregated trades are not available where the Client directs that his/her transactions be executed at a broker/dealer other than Fidelity Investments.

## **Review of Accounts**

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### **Periodic Reviews**

On a periodic basis, and at least annually, Solamere Advisors reviews Client accounts for consistency with Client objectives, allocations, strategies, and Client-imposed restrictions. Reviews are performed by designated principals of the Firm, typically a Managing Director or the Chief Compliance Officer. Reviews may be triggered by such events as a client deposit or withdrawal, a significant change in account value, updates to a Client's profile, re-balancing considerations, and/or a Client's request to alter or change a strategy.

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## **Reports**

Solamere Advisors makes available to its investment management Clients quarterly portfolio evaluations prepared by Black Diamond Performance Reporting™, a third party vendor. These quarterly evaluation reports reflect the account's investment performance on both a net of Fees and Gross of Fees basis. Solamere Advisors may also provide net worth statements and net worth graphs to Clients, which may contain values and balances provided by the Client, as well as the estimates of value for land and other assets which are difficult to value. These net worth statements are useful in long-term financial planning, where the exact values of assets are not material to the financial planning tasks, and are provided by Solamere Advisors as a service; the Firm has no responsibility for the accuracy of any information provided by Client or unrelated parties.

Unless the Client has elected to suppress confirmations, the custodian will provide the Client with confirmations on each transaction through the associated custodial account. The custodian will also provide Client with account statements on at least a quarterly basis. In the event of any conflict or discrepancy with reports provided by the Firm, Clients should rely upon the brokerage statements or reports.

## **Client Referrals and Other Compensation**

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### **Client Referrals**

Solamere Advisors does not receive compensation for any Client referrals to third parties for investment services at this time. Any compensation which the Firm should pay for Client referrals in the future will comply with all applicable rules and regulations, including SEC rule 206(4)-3.

## **Custody**

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### **Custody**

Client assets are held in an account(s) maintained with qualified a custodian(s ) (the "Custodian"). Other than its ability to deduct Fees from Client accounts, Solamere Advisors does not have legal custody of any Client assets.

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### **Statements**

Clients will receive account statements from the Custodian on at least a quarterly basis. Clients are urged to compare those statements with the performance evaluations and any other reports provided by Solamere Advisors.

## **Investment Discretion**

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### **Discretionary Authority for Trading**

In most Client accounts, Solamere Advisors is given the authority to discretionarily manage the portfolio. The terms of the discretion are set forth in the relevant

Agreement. Where it has discretion, Solamere Advisors determines, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. In exercising its discretion, Solamere Advisors invests and reinvests the account assets in accordance with the relevant Client's investment objectives as detailed in the applicable Agreement, risk profile questionnaire, Client profile, and/or any investment policy statement, as well as any reasonable written directives or limitations imposed by the Client.

## **Voting Client Securities**

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### **Voting Proxies**

Solamere Advisors does not vote proxies associated with Clients' securities. Clients maintain exclusive responsibility for: (1) directing the manner in which all proxies will be voted and (2) making all elections relative to any merger, acquisition, tender offer, bankruptcy proceeding or other such event relevant to the Clients' investments. Each custodian is directed to forward copies of all relevant proxies and shareholder communications to the Client for consideration and action.

Any third party investment manager used with Client's assets will independently determine whether it will vote proxies. For investments managed by a third party manager, Client should review that manager's ADV Firm Brochure to determine how proxy responsibilities are allocated.

## **Financial Information**

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### **Financial Condition**

As Solamere Advisors does not require or solicit prepayment of Fees six months or more in advance, its balance sheet is not required in this Brochure. There is no financial condition that is reasonably likely to impair the Firm's ability to meet its contractual commitments to Clients.

## **Privacy Policy**

**Our Commitment to Your Privacy:** CAMG Solamere Management, LLC ("we", "us") protects the confidentiality and security of information we collect about clients we serve. We will not share nonpublic personal information about you ("Information") with third parties without your consent, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

**Why We Collect and How We Use Information:** We collect and use Information to provide you the investment services underlying our relationship. Such services include providing investment advice and/or management over the assets you place with us,

effectuating transactions on your behalf, and providing the administrative services described in our investment advisory agreement and disclosure documents.

**How We Gather Information:** We get most Information directly from you or from sources you provide us. We may verify this Information or get additional Information from consumer reporting agencies or other sources. This Information may relate to your finances, employment and other elements of your personal and financial profile, and include your name, address, phone number, social security number and email address, as well as accounts with us and transactions and interactions by, with or through us and other investment advisors or broker/dealers.

**How We Protect Information:** Our employees are required to protect the confidentiality of Information and to comply with our established policies. They are authorized to access Information only when there is an appropriate reason to do so in the overall context of our relationship with you. Employees who violate our Privacy Policy are subject to disciplinary process. In addition, we maintain physical, electronic and procedural safeguards to protect Information, which comply with applicable laws.

**Disclosure of Information:** We may disclose any kind of Information to or as directed by you or when we believe it necessary in providing you our services, or where disclosure is required or permitted by law. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies to help, among other things, prevent fraud or money laundering. In addition, we may disclose any kind of Information to third party service providers (i) to enable them to provide business services for us, such as performing reporting, computer related or data maintenance or processing services for us, (ii) to facilitate the processing of transactions on your behalf, (iii) to assist us in offering products and services to you, or (iv) for credit review and reporting purposes. Except in those specific, limited situations, without your consent, we will not make any disclosures of Information to other nonaffiliated companies who may want to sell their products or services to you. For example, we do not sell customer lists, and we will not sell your name to a catalog company or telemarketer.

**Former Clients:** Even if you are no longer a client, our Privacy Policy will continue to apply to Information about you.

**To Whom This Policy Applies:** This Privacy Policy applies to individuals to whom we provide investment services, provided such services are primarily for personal, family, or household purposes (not business purposes), whether or not the individuals have a customer relationship with us.

**Further Information:** We reserve the right to change this Privacy Policy. If there are material changes, an updated Policy will be sent to you. The examples contained within this Privacy Policy are illustrations and are not exclusive.

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