

## **WRAP FEE BROCHURE**

**Select Money Management, Inc.  
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**March 31, 2015**

This wrap fee program brochure (this “Brochure”) provides information about the qualifications and business practices of Select Money Management, Inc. (referred to in this Brochure as “us,” “we,” “our” or the “firm”). If you have any questions about the contents of this Brochure, please contact us at (949) 975-7900. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Additional information about us also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). We are a registered investment adviser. Registration of an adviser does not imply any level of skill or training.

## **ITEM 2: SUMMARY OF MATERIAL CHANGES**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes. There have been no material changes since our last filing June 25, 2014.

Generally, Select Money Management, Inc. will notify you and our other clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly.

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## **ITEM 4: SERVICES, FEES AND COMPENSATION**

### **Our Services**

We sponsor the Select Money Management Wrap Fee Program (the “Program”), which is a fee-only investment program, offered on a discretionary basis. If you participate in the Program, we will charge your account a single, specified fee, which includes the costs of investment management, brokerage, custody, and other services provided under the Program. Our program fees, minimum account requirements and additional information about our firm are described in more detail below.

We emphasize continuous personal contact and interaction with you when providing discretionary portfolio supervisory services in the Program. We base our services upon your individual financial and personal needs, investment objectives, time horizon, and risk tolerance.

Prior to engaging us to provide our services you will be required to enter into our Portfolio Management Services Agreement with us setting forth the terms and conditions under which we will provide our services. By its terms, you will grant us limited discretionary authority to manage the assets held in your account in accordance with the applicable model or custom portfolios through the purchase, sale, exchange, redemption, conversion, or other disposition of investments, income, or proceeds deposited and held in your account. We will obtain information from you about your financial situation, investment objectives and risk tolerance, by meeting with you and providing you with a questionnaire or using another method designed to obtain your relevant financial information. We provide our investment advice solely on a discretionary basis. Based upon your individual investment objectives, financial situation, and risk tolerance, we will recommend an initial portfolio allocation. As your financial situation, goals, objectives, or needs change, you must notify us promptly. In addition, you will have the opportunity to place reasonable restrictions on the types of investments held in your portfolio.

### **Our Fees**

Although fees for the Program may be negotiated under certain circumstances, our standard fee schedule is as follows:

<b><u>Aggregate (or Family) Account Value</u></b>	<b><u>Annual Fee</u> Custom, Equity High Yield, Country or Special Opportunities Models</b>	<b><u>Annual Fee</u> Tactical Growth Model</b>	<b><u>Annual Fee</u> Balanced Model</b>	<b><u>Annual Fee</u> Tactical Bond or Tactical Fixed Income Models</b>	<b><u>Annual Fee</u> Low Duration or Cash Models</b>
\$25,000.00 - \$150,000.00	2.40%	2.10%	2.00%	1.80%	0.25%
\$150,000.01 - \$250,000.00	2.20%	2.00%	1.90%	1.70%	0.25%
\$250,000.01 - \$500,000.00	1.90%	1.80%	1.80%	1.60%	0.25%

\$500,000.01 - \$750,000.00	1.80%	1.70%	1.70%	1.50%	0.25%
\$750,000.01 - \$1,000,000.00	1.70%	1.60%	1.40%	1.30%	0.25%
\$1,000,000.01 - \$2,000,000.00	1.30%	1.20%	1.10%	1.00%	0.25%
\$2,000,000.01 - \$3,000,000.00	1.00%	0.90%	0.90%	0.80%	0.25%
\$3,000,000.01 - \$4,000,000.00	0.90%	0.80%	0.80%	0.80%	0.25%
\$4,000,000.01 - \$5,000,000.00	0.80%	0.80%	0.80%	0.80%	0.25%
\$5,000,000.01 - and above	Negotiated	Negotiated	Negotiated	Negotiated	Negotiated

We may negotiate any of our fees, taking into consideration such things as the size of your account, the number of managed portfolios, your relationship with other clients, the length of our relationship with you, the complexity of your personal circumstances, the composition of your portfolio, the complexity of investment strategies, the frequency of desired meetings or special reporting, and other factors that affect our cost of providing services for you. If you, your family, or related persons also have accounts under our management, those accounts may be aggregated for fee calculation purposes. For these reasons, our fees may vary among clients who may be in similar circumstances.

Other investment advisors may charge higher or lower fees for comparable services. We will seek to assure that you are charged a competitive rate according to the size of the account being managed. We reserve the right to modify the fee schedule upon a minimum of thirty (30) days prior written notice to you.

Our fees will be billed quarterly in arrears and will be automatically withdrawn from your account pursuant to your authorization. In any partial calendar quarter, our fees will be pro-rated based on the number of days your account was under our management. For the purpose of determining our fees, the market value of assets under management shall be measured on the last business day of the immediately preceding billing quarter. We will rely upon the valuations provided by the custodian without independent verification. In the event that you terminate your account prior to the end of a quarter, our final fee will be pro-rated based on the number of days your account was under our management and will either be deducted from your account in the same manner or an invoice will be sent. Unless otherwise negotiated, once your asset value exceeds the highest dollar value in the current bracket, the fee will be adjusted according to the fee schedule. Our Program fee includes transaction fees, and other related costs and expenses.

For assets invested outside of our Program, you are responsible for all mutual fund expenses, commissions, transaction fees, and administrative costs.

### ***Fee Comparison***

Our fee includes such services as investment management, execution of securities, the custodian's monthly reports, account servicing, and continuous account management. Participation in our 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 our Program versus paying for executions on a per transaction basis and paying a separate fee for advisory services. You may be able to receive services similar to those offered through our Program from other investment advisers either separately or as part of a similar wrap fee program. These services or programs may cost more or less than our Program, depending on the fees charged by the other service providers. Because we absorb all of the transaction costs in our Program, we have a financial incentive to infrequently trade our Program client accounts because infrequent trades will increase our net fee. To mitigate this conflict of interest in our Program, we monitor for inactive accounts and our Investment Committee manages to model portfolio performance and makes portfolio changes in our clients' best interests whenever necessary, without regard to our transaction costs.

### ***Other Fee and Charges***

In addition to our fee, you may incur other fees and charges not directly related to the execution and clearing of transactions imposed by third-parties, including, but are not limited to, fees charged by your custodian and other fees imposed indirectly by a mutual fund purchased in your account, as disclosed in the fund's prospectus, including, but not limited to, deferred sales charges and 12b-1 fees on previously purchased mutual funds. Custodial fees may include transfer taxes, wire transfer and electronic fund fees, check writing fees, custodial termination fees, and other fees and taxes on brokerage accounts and securities transactions.

### ***Termination***

You may terminate our agreement at any time by giving us five (5) days written notice; we may terminate our agreement by providing you with five (5) days written notice. Upon termination, we prorate the fee through the date of termination and charge you any remaining balance, as appropriate. You are responsible for any cost incurred in transferring your assets from our program to a different custodial account. After our agreement is terminated, we have no further duties or obligations to you under our agreement.

## **ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

### **Account Requirements**

The SELECT Tactically-Managed Model Portfolios require a minimum of \$25,000 in assets. Some strategies may have higher required minimums. A minimum of \$250,000 in assets is

required to participate in the Custom Portfolios. We may waive the minimum requirements at our discretion.

### **Types of Clients**

We provide portfolio management services to individuals, high net worth individuals, businesses, corporate pension and profit sharing plans, trusts, charitable institutions, foundations, and endowments.

## **ITEM 6: PORTFOLIO MANAGER SELECTION AND EVALUATION**

### **Advisory Business**

We are the portfolio manager for all accounts in our Program. We also act as solicitor for, and offer advice about other wrap fee programs sponsored by unaffiliated investment advisers (also known as, third-party wrap fee programs). If you select a third-party wrap fee program, you will enter into a separate written agreement setting forth the terms and conditions of your engagement with them, describing the scope of services related fees.

For additional information regarding the third-party wrap fee programs we make available, contact your investment advisory representative or our office at (949) 975-7900 to receive a copy of Part 2A of our Form ADV Disclosure Brochure, as well as the disclosure brochures for any of the third-party wrap fee programs we make available.

Our affiliate, Select Portfolio Management, Inc., makes available financial planning services including, but not limited to, investment planning, retirement planning, estate planning, charitable planning, education planning, business planning, and asset protection planning. If you would like our affiliate to provide you with financial planning services, you will enter into a separate written agreement with them setting forth the terms and conditions of your engagement, describing the scope of their services to be provided, and their fee. Most of our investment advisory representatives are also investment advisory representatives of Select Portfolio Management, Inc.

For financial planning and other services, you may also request a copy of Select Portfolio Management, Inc.'s Part 2A of Form ADV Disclosure brochure by calling the number above or contacting your investment advisory representative.

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

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets).

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

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

When advising you about your investments or managing your account, we typically use several methods to analyze the securities that we may select for your investment portfolio, including

fundamental and technical analysis. We also consider cyclical factors affecting some industries and companies more than others. We also consider factors such as the strength of the company's or mutual fund's management team.

***Fundamental analysis*** is a technique that attempts to determine a security's value by focusing on the economic well-being of a company, as opposed to movements of its market price. In the course of our analysis, we will review a company's financial statements and consider factors including, but not limited to, the company's historical financial condition, prior operating results and trends, its projected revenue growth, its competitive advantages and disadvantages, the anticipated demand for its current and future products or services, the age and nature of its assets, and other factors affecting the company's anticipated results from future operations. Past performance does not assure similar future performance. A company's fundamental value can be adversely affected by many factors unrelated to its actual operating performance.

***Technical analysis*** is another method to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the movement of stock prices in the market, both individually and within an industry or sector of the economy. Technical analysis studies the supply and demand in the market in an attempt to determine historical and future trends. Notwithstanding favorable market price movements, a company's financial condition and other unique factors can adversely affect its value. Technical analysis relies upon stock movements and volume reflected in historical stock charts, often compared with various market benchmarks.

***Cyclical factors*** are relevant to some industries and some company's stocks more than others. A cyclical industry or stock is generally more sensitive to our economy's business cycle. Business cycles are the recurring and fluctuating levels of economic activity that our economy experiences over a period of several years. The five stages of the business cycle are growth (expansion), peak, recession (contraction), trough and recovery. Business cycles vary in frequency, magnitude and duration. The revenue for cyclical industries and stocks are generally higher in periods of economic prosperity and expansion and lower in periods of economic downturn and contraction. Some industries and stocks tend to be counter-cyclical. The revenue for counter-cyclical industries and stocks tend to be negatively correlated to the overall state of the economy. A counter-cyclical stock's price will tend to move in a direction that is opposite to the general economic trend.

We obtain information from a number of sources, both public and by purchase, including financial newspapers and magazines, inspection of corporate activities, research materials prepared by third-parties, corporate rating services, annual reports, prospectuses, reports filed with the SEC, and company press releases. We believe these resources for information are reliable and we regularly depend on these resources for making our investment decisions.

### ***Investment Strategies***

We use a variety of investment strategies depending on your circumstances, financial objectives and needs. We may recommend implementing one or more of the following investment



strategies: long-term purchases (held at least a year), short term purchases (held less than a year), trading (held less than 30 days), margin transactions (purchase of a security on credit extended by a securities company), and option writing (selling an option) or a combination of these strategies to help you meet your investment objectives.

We may recommend implementing these strategies using stocks, bonds, mutual funds (held directly or held within variable annuities or life insurance products), municipal securities, options contracts, futures contracts and other types of investments. We often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic/international, or equities/bonds. We may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in your needs, market conditions, or economic developments. These recommendations will be implemented through our affiliated broker-dealer Securities Equity Group.

Our Program provides the following portfolio management services:

SELECT's Tactically-Managed Model Portfolios

- Tactical Bond Model – Seeks exposure to fixed income managers and may contain mutual funds, I & D shares or Exchange-Traded Funds (ETFs).
- Balanced Model – Designed for moderate investors seeking a balance of equity and fixed income holdings.
- Tactical Growth Model – Seeks capital appreciation primarily through sector and broad based funds.
- Tactical Fixed Income Model – Seeks capital appreciation primarily through sector and broad based funds with income focused stocks.
- Equity High Yield Model – Moderate growth portfolio focusing on stocks that have historically consistent dividend payments.
- Tactical Based Country Model – Seeks out opportunities within various countries.
- Tactical Managed Special Opportunities Model – Seeks out unique opportunities within the market.
- Low Duration Model – Seeks out low risk type of returns.
- Cash Model – Designed for liquidity needs.

## Custom Portfolio Models

Custom strategies are created based on our understanding of your specific financial circumstances, future financial needs, investment goals, return objectives, and risk tolerance, and may be comprised of separately managed accounts (SMAs), no-load mutual funds, exchange-traded funds (ETFs), unit investment trusts (UITs), bonds, variable products, annuities, and/or individual securities. Once a portfolio is created, decisions regarding the type, amount, and holding period of any investment are made in accordance with client circumstances, client requests, or investment policy statements. Each portfolio is actively managed on a discretionary basis in accordance with fundamental and technical analysis of the markets as defined and discussed above.

Additional models may be created based upon needs of our clients.

## ***Investment Risks and Rewards***

Investing in securities involves risk of loss that you should be prepared to bear. Securities, mutual funds, variable products, annuities and other types of investments all bear different types and levels of risk. Upon request, we can discuss the types of investments and investment strategies that we believe may tend to reduce these risks in light of your personal circumstances and financial objectives.

For our portfolio management services, we use a proprietary methodology to determine when to buy/sell mutual funds or other securities for our separately managed accounts. No assurance can be given that any fee-based portfolio management service will result in profitable investments for you or that you will not incur losses. The results of any fee-based portfolio management service cannot be guaranteed and do not take into consideration the timing of your purchase of any particular security, how long you have held the security, your other investments, or the specific tax consequences of the sale or purchase of any securities. All risk of gain or loss in the investments and all expenses of the account(s) are your sole responsibility.

We provide no guarantee regarding the timing of a trade or exchange. While we attempt to execute trades within twenty-four (24) hours of a signal or decision, delays could occur. Processing time delays incurred by the mutual fund companies, insurance companies, brokerage firms, clearing firms and custodians are not our responsibility and in such event we assume no responsibility for any possible losses. In the event that a trade or exchange is missed with material losses resulting, we assume no responsibility for such losses. You will be required to waive any claim to specific, direct or consequential damages and agree that your sole remedy shall be either (1) the refund of the quarterly fee and cancellation of the Agreement or (2) the account(s) will be managed without charge for a term to be determined by us.

While we design investment strategies to provide appropriate investment diversification, some investments have significantly greater risk than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Our investment strategies seek to balance

risks and rewards to achieve investment objectives. Ask questions about investment risks you do not understand. Our representatives will be able to discuss them with you.

We strive to render our best judgment on behalf of our clients. However, we cannot assure you that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment advisor but is not a reliable predictor of future performance. We continuously strive to provide outstanding long-term investment performance, but many economic market variables beyond our control can affect the performance of an investment portfolio.

Generally, some of the more common investment-related risks that may affect your investment portfolio include:

- Business risks are associated with a particular company or industry. For example, start-up companies carry greater business risks than established companies. Companies developing new technologies carry greater business risks than manufacturers of well-established or widely used products and services.
- Financial risks are often associated with the ability of a company to raise capital or finance its operations, as well as its ability to repay indebtedness. Highly leveraged companies face greater financial risks than well-capitalized companies do.
- Market risks are related to the effects of economic, political, natural disasters, or other events on the price of a publicly-traded stock, bond, exchange-traded fund, or other securities. This type of risk is typically affected by extrinsic factors that often are not related to a particular company's financial condition, performance, or circumstances. For example, investment speculation can materially affect market prices.
- Liquidity risks are associated with an investor's ability to readily convert a security or other asset into cash. Generally, there is greater liquidity for securities that are publicly traded on stock exchanges or trading facilities that match buy and sell orders. Privately offered securities may be highly illiquid because there is little or no trading or market activity.
- Concentration risks result from a lack of investment diversification, which may be expressed in terms of geography, industry, or economic sector. Mutual funds typically invest in a large number of different companies, typically lowering the risk that occurs when the investment consists of only one or a smaller number of companies.
- Options are complex, derivative securities that involve special risks. Option contracts expire at a stated maturity date and have no further value. Unlike traditional securities, the value of an option and the return from holding an option varies with the value of the underlying security from which it derives and other factors.

- Interest-rate risks are associated with changes to investment prices due to increasing or decreasing interest rates. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline. Generally, the principal value of the bond is received upon the particular bond's maturity, even though you may have purchased it at a premium or a discount from its face value. The impact of interest rate changes is different for bonds held inside of a mutual fund or pooled investment where a particular bond is not held until its maturity.
- Inflationary and deflationary risks are associated with the purchasing power of the dollar, which is affected by broad economic, monetary, governmental policies, and the balance of supply and demand for products and services.
- Reinvestment risks are typically related to fluctuations in the potential interest rate at which future investment proceeds may have to be invested. For example, reinvestment risks may increase during periods of falling interest rates. This risk primarily relates to bonds and other fixed income securities.
- Currency risks are primarily associated with foreign investments. For example, a company's earnings in a foreign country may be affected by fluctuations in the value of the dollar against that foreign currency. Similarly, the investment return of a foreign security may be affected by changes in currency exchange rates.
- The use of portfolio models is a cost-effective way to manage a large number of accounts; however, when models are used, the trading that occurs typically does not take into consideration the specific circumstances of an investor such as the investment horizon, holding period, and tax considerations.

### ***Types of Investments***

We provide investment advice with respect to a wide range of investments, including no-load mutual funds, indexed funds, exchange traded funds (generically referred to as "*funds*"), unit investment trusts, stocks, bonds, annuities and other types of investment securities. Advice may also be given to clients with interests in partnerships investing in other business activities such as real estate investment trusts (REITs), and various types of insurance products that may include investment features.

We often offer advice about separately managed accounts by unaffiliated investment advisors, mutual funds, exchange-traded funds, and variable annuities. Our representatives will answer any questions you may have about these kinds of investments and investment programs.

***Mutual Funds*** of all types charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees and expenses are described in each fund's prospectus. 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. These separate mutual

fund fees are disclosed in each fund's current prospectus, which is available from the mutual fund and, upon request, can be provided by us.

Most mutual funds offer several "classes" of their shares which may be purchased by different types of investors or investors with different investment objectives. These are also described in the mutual funds' prospectuses. Depending on your investable assets, investment objectives, and time horizon, different classes may be more appropriate. We will be able to discuss the available classes of mutual fund shares that may be available, the different purposes for which they may be purchased, and the differences in commissions and charges that are associated with each share class.

**Variable Annuities** are highly complex financial products offered by insurance companies. Investments in a variable annuity contract are subject to both general market risk and the insurance company's credit risk. These and other risks are described in the variable annuities' prospectuses. Variable annuities are regulated under both securities and insurance laws and related rules and regulations. Variable annuities offer various benefits and features which may or may not have value to you depending on your circumstances. Like other types of investments, commissions are paid for the purchase of variable annuities and there may be substantial surrender charges. Commission, surrender charges, and other expenses are disclosed in the fund's prospectus.

### **Voting Client Securities**

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in your account. Proxy solicitation materials will be forwarded to you by your custodian for response and voting. If you have any questions about a particular proxy voting matter, please do not hesitate to ask.

### **ITEM 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

As the portfolio manager, our investment adviser representatives have access to all of the information you provide to us, including financial information. Our firm has adopted a Privacy Policy which restricts our firm and our investment adviser representatives' use of and access to your nonpublic personal information. In order for us and our investment adviser representatives to effectively manage your account and assist in meeting your financial objectives, we ask you to update us as soon as possible when any changes to personal or financial information occur. A complete copy of our Privacy Policy is attached at the end of this Brochure.

### **ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS**

You may contact or consult with us regarding the Program or your account by calling (949) 975-7900 during business hours. We are open Monday through Friday from 8:30 a.m. to 5:00 p.m.

## **ITEM 9: ADDITIONAL INFORMATION**

### **Disciplinary Information**

As a registered investment adviser, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your 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**

We are affiliated by common ownership with Select Portfolio Management, Inc., another investment advisor registered with the SEC. We may refer you to Select Portfolio Management, Inc. for its advisory services. Its services, fees, and additional important information are disclosed in its own firm brochure, which you will receive before engaging in its advisory services.

We are also affiliated by common ownership with broker-dealer, Securities Equity Group, member FINRA and SIPC. Securities Equity Group acts as a fully disclosed introducing broker-dealer for National Financial Services, LLC, who holds client assets and executes transactions for client accounts. Securities Equity Group is not affiliated with National Financial Services, LLC. To participate in our Program described in this brochure, you must open account with Securities Equity Group.

We are also affiliated by common ownership with SPM Insurance Services, Inc. an independent wholesale insurance agency. We may refer you to SPM Insurance Services, Inc. for insurance services available through its licensed agents.

Carin R. Amaradio owns and manages Select Money Management, Inc., Select Portfolio Management, Inc., Securities Equity Group and SPM Insurance Services, Inc. In addition, Daniel Amaradio, Semir Amin, Mark Goldsmith, Gary McCarver, Park Randazzo and Carin Amaradio are all registered representatives of broker-dealer Securities Equity Group and may earn commissions on securities transactions that may be recommended by them for brokerage accounts that are not included in our Program.

Commissions earned on variable insurance products are typically higher and in some instances substantial compared to commissions earned on mutual funds or other securities. Because of this, there exists a potential conflict of interest in the recommendation made by the representative that serves both as an investment advisor representative and a registered representative who earns commission on the products being recommended.

Other than investment recommendations in our Program, you are under no obligation to implement investment and insurance recommendations through Securities Equity Group or through any insurance companies our representatives are affiliated or contracted with. Commissions may be higher or lower at Securities Equity Group than at other broker-dealers. Full disclosure is provided to you prior to executing any transaction. Our firm and our representatives receive no commission if you choose to purchase securities through a broker-dealer other than Securities Equity Group.

Anthony Amaradio, Carin Amaradio, Daniel Amaradio, Semir Amin, Mark Goldsmith, Gary McCarver, and Park Randazzo are also investment advisor representatives of affiliate Select Portfolio Management, Inc. and can earn fees on services that they may have recommended.

Due to the relationships between the affiliated companies, potential conflicts of interest may arise with advisor recommendations. We address the potential conflicts by disclosing these relationships and the compensation we may earn when you engage in our services.

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

We have adopted a Code of Ethics that is intended to help us put your interests above our own. The Code of Ethics sets forth the standards of business conduct that our firm and our representatives are expected to follow. The Code of Ethics also imposes certain reporting requirements with which particular individuals, associated with or employed by us, must comply. We will provide a copy of our Code of Ethics to you upon request.

#### **Participation or Interest in Client Transactions**

As a general proposition, our firm and our representatives may recommend to you securities that are available through registered broker-dealer Securities Equity Group, member FINRA and SIPC. Comparable securities are available through other individuals or broker-dealers at competitive rates.

Neither our firm, nor our representatives: (i) as principal, buys securities for themselves from, or sells securities they own to, a client; or (ii) as broker or agent for any person other than a client, effects transactions in which securities are sold to or bought from a brokerage customer; or (iii) recommends to clients that they buy or sell securities or investment products in which applicant or a related person has some financial interest.

Our firm and our representatives may purchase a security recommended to you for their account; however, neither our firm nor our officers, representatives and/or employees may purchase a security for their own account or the account of an immediate family member strictly for purposes of recommending or purchasing the same security for clients, and then shortly thereafter profitably selling the security for their own account or for the account of their immediate family.

### **Review of Accounts**

**Reviews and Reviewers** – Reviewers include: Anthony Amaradio, Daniel Amaradio, Semir Amin, Mark Goldsmith, Gary McCarver and Park Randazzo. All representatives are expected to provide review services as specified by our firm and the number of accounts assigned to each representative will vary. Many accounts are reviewed on a regular basis by more than one representative. You are contacted periodically for reviews and interim financial reviews are available upon request.

***Account Reporting*** – Statements showing the account value in these investments are prepared and forwarded to our clients on a quarterly basis along with the billing information. You will also receive a confirmation of each purchase and sales transaction that occurs within your account directly from the companies or custodians that hold your investments.

You must contact us when a real or potential change in your financial condition occurs so we can review the portfolio along with your new information to ensure the investment strategies continue to be appropriate.

### **Client Referrals and Compensation**

As described above under the heading *Advisory Business*, we are a solicitor for, and may recommend that you engage the services of, a third-party investment advisor through a wrap fee program. If you do, we will receive a portion of the wrap fee you pay to the program sponsor. Our solicitor's compensation is described in the sponsor's wrap fee brochure and in a solicitor's disclosure statement. You will not pay the program sponsor any additional fees by virtue of our having made the referral and we do not charge any additional fees with respect to your assets invested through a wrap fee program. We will seek to assure that the fees charged to our clients by program sponsors are competitive and consistent with fees charged to that program sponsor's other clients.

From time to time we may engage solicitors to market our services. We pay solicitors for their services, as described in a separate solicitor's brochure that you should have received, together with a copy of this firm's brochure, when the solicitor introduced you to our firm. The amount of compensation we pay solicitors is typically a share of the fees you pay us. The amount may vary by solicitor and may vary over time. Our method of computing the solicitor's compensation is described in the solicitor's brochure. Compensation paid or received in connection with these relationships creates potential conflicts of interest that you should carefully consider in evaluating and acting upon our recommendation

### **Financial Information**

We have no financial liabilities, obligations, or commitment that impairs our ability to meet our contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding.



## **PRIVACY POLICY - NOTICE REGARDING PRIVACY OF CUSTOMER INFORMATION**

This notice is provided to you on behalf of Select Money Management, Inc., Select Portfolio Management, Inc., and Securities Equity Group (collectively referred to in this notice as “we”, “us”, “our”, or “Affiliated Companies”). Protecting our customers’ privacy is of paramount importance. We recognize that an individual’s financial matters are private and sensitive in nature, and we have adopted policies that assist us in protecting your privacy and, at the same time, help us to provide you with a broad range of high quality financial products and services.

This Privacy Policy will explain the types of information we collect about you, how we use and share that information, and how you can instruct us to limit certain types of information sharing. Information we obtain from all customers and former customers is treated in the same manner.

### **How We Protect Your Information:**

We protect your data and safeguard it from those not authorized to see it by adopting internal policies and procedures. Under no circumstances will we sell confidential customer information to anyone.

### **What Information We Collect about You:**

- We collect information from you when you open an account or enroll in one of our services. The information we collect may include, but is not limited to: your name, address, phone number, email address, social security number and date of birth, as well as details about your investments and investment experience.
- Once you have opened an account with us, we collect and maintain confidential customer information about your account activity, including your transactions, balances, positions, and history. This information allows us to provide the services you have requested.
- We may collect information about you from information services and consumer reporting agencies to verify your identity, employment, or creditworthiness, or to better understand your financial needs.
- The law permits us to share information about our current and former customers with government agencies or authorized third parties under certain circumstances. For example, we may be required to share such information in response to subpoenas or to comply with certain laws.

### **How We Share Information About You With Affiliated Companies:**

Select Money Management, Inc. (“SMM”) and Select Portfolio Management, Inc. (“SPM”) are federally regulated registered investment advisors affiliated via common ownership with Securities Equity Group (“SEG”), an independent broker-dealer, member of FINRA and SIPC, and with SPM Insurance Services, Inc., an independent wholesale insurance agency. We may share information we collect about you among our Affiliated Companies to:

- help provide you with better service or perform services on your behalf;
- respond to communications from you or as you authorize or request;
- make it more convenient for you to open a new account; and
- allow an Affiliated Company to provide you with information about their products and services that we believe may benefit or interest you.

You may instruct us not to share information about you with our Affiliated Companies for certain purposes, as explained under *How to Limit the Sharing of Information about You*.

**How We Share Information About You With Non-Affiliated Companies:**

We provide access to information about you to outside companies and other third parties in certain limited circumstances, including:

- to help us process transactions for your account;
- when we use another company to provide services for us, such as printing or mailing account statements; and
- when we believe that disclosure is required or permitted under law. For example, we may be required to disclose personal information to cooperate with regulatory or law enforcement authorities, to report your tax-related information to federal and state governments, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.

If your SMM/SPM Investment Advisor Representative or SEG Registered Representative leaves us to join another firm, they are permitted to retain copies of your information to facilitate the transfer of your account to a new broker-dealer or investment advisor in order to serve you at their new firm. Their continuing use of your information will be subject to the new firm's privacy policy. You are not obligated to transfer your account if your Investment Advisor Representative or SEG Registered Representative leaves us, and you may instruct us **not** to allow the sharing of information as explained.

**How to Limit the Sharing of Information about You:**

If you prefer, you may choose to limit the information we share about you with our Affiliated and Non-Affiliated Companies. Specifically, you may instruct us:

- **not** to allow our Affiliated Companies to market their financial products or services to you;
- **not** to share confidential customer information about you with a Non-Affiliated company for joint marketing purposes; and
- **not** to allow your SMM/SPM Investment Advisor Representative or SEG Registered Representative to take your information to facilitate the transfer of your account(s) should they leave any of our Affiliated Companies.

You may exercise your choice by writing us at Select Money Management, Inc., Attn: Compliance Department, 26800 Aliso Viejo Parkway – Suite 150, Aliso Viejo, CA 92656. Your choice will be applied to you as an individual and will automatically be extended to all of your accounts with any of our Affiliated Companies. You may make your privacy choice at any time and it will remain in effect until you change it in writing.

**Safeguarding Your Information, Maintaining Your Trust:**

We take precautions to ensure the information we collect about you is protected and is accessed only by authorized individuals or organizations. Our employees are trained about privacy and are required to safeguard confidential customer information. We maintain physical, electronic, and procedural safeguards to protect confidential customer information.

**Contact Us with Any Questions:**

If you have any questions or concerns, or if you identify any information that you believe is no longer accurate, you may contact your SMM/SPM Investment Advisor Representative, SEG Registered Representative, or write to:

**Select Money Management, Inc.**  
**Attn: Compliance Department**  
**26800 Aliso Viejo Parkway – Suite 150**  
**Aliso Viejo, CA 92656.**  
**1-800-445-9822**

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