



## **Wrap Fee Program Brochure**

**Form ADV Part 2A**

Athena Leadership Corp.  
1029 J Street Suite 130  
Sacramento, CA 95814  
[www.athenaleadershipcorp.com](http://www.athenaleadershipcorp.com)

This brochure provides information about the qualifications and business practices of Athena Leadership Corp. If you have any questions about the contents of this brochure, please contact us at [support@athenaleadershipcorp.com](mailto:support@athenaleadershipcorp.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 Valued Investing is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Material Changes

N/A

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## **General Firm Information**

Athena Leadership Corp. is an internet-based investment advisor that utilizes investment objectives and risk evaluation to match clients into one of five portfolios composed of securities that match Athena Leadership Corp.'s objective of investing in securities of corporations that support gender equality and promoting women in leadership positions. This service is provided through the company's website, [www.athenaleadershipcorp.com](http://www.athenaleadershipcorp.com). Athena Leadership Corp. was incorporated under California law in December 2013. The principal owners of Athena Leadership Corp. are Ryan Coffin (President), Joshua Pulliam (Vice President), Jennifer Pulliam (Treasurer) and Heather Coffin (Director).

## **Advisory Services and Investment Strategy**

Athena Leadership Corp. provides investment management based on each individual client's investment objectives and risk tolerance. There are five different client portfolios that are managed to match the client's specific objectives and risk tolerances. Through Athena Leadership Corp.'s online questionnaire, clients answer a variety of questions that match them into one of the five portfolios. Clients are aware that Athena Leadership Corp. has one main investment criteria and all of the portfolios are managed to meet that criteria to the best of their ability.

Currently, client portfolios are only invested in domestic equities, fixed income ETFs and Closed-End Funds. Athena Leadership Corp. plans to offer access to additional asset classes in the future. Portfolios may contain individual stocks, fixed income ETFs and Closed End Funds and each portfolio typically consists of 10- 25 corporations. The portfolios are constructed using screens for women in management positions and gender equality measures and proprietary valuations methods. Furthermore, portfolio managers utilize various analytical tools to determine portfolio allocation.

These portfolios are built and invested in for the client's social preference, and the client is aware that the screens utilized within the portfolio reduce diversification and increase risk by potentially limiting certain sectors or industries. The portfolio is optimized by provided as much of a diverse asset allocation as possible providing the constraints of social investing.

## **Fees and Compensation**

Clients pay a wrap-fee of 1.25% of their total assets under management. This fee includes maintaining an account with Athena Leadership Corp., advisory services, research, transaction (trade) costs, custodian costs, administration, account reporting and

any other incidental expenses associated with account maintenance. Athena Leadership Corp. only provides investment management and advice through the wrap fee program and services cannot be purchased separately. Fees are non-negotiable.

Athena Leadership Corp.'s fee structure is not charged in advance. Fees are calculated on a monthly basis and deducted from client accounts. Fee calculation is done by multiplying the applicable annual fee rate by the end-of-month account balance and dividing by twelve.

**Fee Example:** An account with a balance of \$5,000 at market close would have a monthly fee equal to \$5.20 --- ( $\$5,000 \times 1.25\% / 12$ )

Athena Leadership Corp. can utilize outside investment advisors through investments in ETFs and Closed End Funds. The fees associated with investing in third party investment managers is included in Athena Leadership Corp.'s wrap fee. All fees are paid directly to Athena Leadership Corp.

### Assets Under Management

As disclosed in Athena Leadership Corp.'s Form ADV Part 1, the firm manages \$500 of client assets on a discretionary basis. The total is calculated as of November 2014. The firm manages no assets on a non-discretionary basis due to its regulation status.

### Account Requirements and Types of Clients

Athena Leadership Corp. accepts all clients with a minimum initial deposit of \$500. All clients are provided with the same services. Fees for clients vary based on account balance and this is detailed in section titled Services, Fees and Compensation. Athena Leadership Corp. is only accepting individual clients at this time.

### Portfolio Manager Selection and Evaluation

Athena Leadership Corp. manages all client portfolios directly, but may invest in ETFs and Closed End Funds allowing for third party investment managers. Athena Leadership Corp. performs due diligence on the various investment managers and had selects them for their expertise in different asset classes. All clients are enrolled in the Wrap Fee Program.

### Client Information Provided to Portfolio Managers

Athena Leadership Corp. shares no personal information is shared with other portfolio managers. The only information transmitted is the size of the position within the clients portfolio.

## **Client Contact with Portfolio Managers**

Athena Leadership Corp. will, by request, provide information to clients regarding third party portfolio managers.

As an Internet advisor defined by SEC rule [17 CFR 275.203A-2], Athena Leadership Corp. may only provide investment advice through the interactive website located at [www.athenaleadershipcorp.com](http://www.athenaleadershipcorp.com)

Technical support can be reached at [support@athenaleadershipcorp.com](mailto:support@athenaleadershipcorp.com)

## **Additional Information**

N/A

## **Disciplinary Information**

Athena Leadership Corp. has not been the subject of any disciplinary events by regulators, nor has any employee been subject to disciplinary action by regulators.

## **Other Financial Activities and Affiliations**

Athena Leadership Corp. is the General Partner/Portfolio Manager for Athena Leadership Fund, LP. The Fund is a private, domestic hedge fund that is exempt from regulation from the Securities Act of 1933.

## **Code of Ethics**

Athena Leadership Corp.'s code of ethics requires that all employees conduct themselves with the highest standards of honest conduct and business ethics. Above all, Athena Leadership Corp. and its employees have the fiduciary responsibility to put client interests ahead of their own. A copy of Athena Leadership Corp.'s Code of Ethics is available to clients and prospective clients upon request.

## **Participation or Interest in Client Transactions and Personal Trading**

Athena Leadership Corp. employees are allowed to purchase and sell securities that are held in client portfolios. However, employees may not purchase or sell any security prior to the execution of any pending transactions for client accounts. In accordance with the Code of Ethics, all employees must sign a document stating they will comply with their fiduciary obligations to clients and applicable securities laws, and that they understand the specific requirements relating to personal trading, insider trading, conflicts of interest, and confidentiality of client information.

## **Review of Accounts**

Clients are given continuous access to securities position and cash balances through an online portal. Additionally, clients receive quarterly reports that provide performance, position and account information. Athena Leadership Corp. will periodically contact clients through email to highlight new product features and enhancements that may allow for further customization of client portfolios.

Athena Leadership Corp. advisors conduct only limited, non-periodic reviews of client accounts when automated alerts indicate that portfolios need advisor attention.

Athena Leadership Corp. monitors the business practices and corporate governance practices of client portfolio companies and funds. At the advisor's discretion, client portfolios will be rebalanced to compensate for change at portfolio's corporate holdings or management.

## **Client Referrals and Other Compensation**

In the future, Athena Leadership Corp. may run promotional campaigns to gain new clients through referrals. These promotions may reward existing or prospective clients with reduced fee arrangements (permanent or for a limited time) or additional services.

Athena Leadership Corp. may also pay third parties to refer prospective clients to the site. Such promotions would compensate third parties using standard online fee structures such as pay for clicks or new accounts. Athena Leadership Corp. will disclose any promotional campaigns for client referrals in updated versions of this filing, Form ADV Part 2A.

## **Financial Information**

Athena Leadership Corp. is not required to disclose financial information because clients do not prepay advisory fees. In addition, Athena Leadership Corp. has not been subject to adverse financial conditions that would necessitate such a disclosure.

## **Client Brochure Supplement Form ADV Part 2B**

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### **Athena Leadership Corp. Management Profiles**

#### **Joshua Walden Pulliam**

Born 1972

Education Background

Business Background

Vice President: Athena Leadership Corp. 12/2013 – Present

President: JPM&M, Inc. 2006- Present

Disclosures

Disciplinary Information: None

Other Business Activity: None

Additional Compensation: None

Supervision: As VP, Mr. Pulliam is not subject to supervision.

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