

Checchi Capital Fund Advisers, LLC

Form ADV Part 2A Investment Adviser Brochure

November 2015

This brochure provides information about the qualifications and business practices of Checchi Capital Fund Advisers, LLC. If you have any questions about the contents of this brochure, please contact Adam D. Checchi, Managing Member, at 310-432-0010. 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 Checchi Capital Fund Advisers, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number, Checchi Capital Fund Advisers, LLC's CRD Number is 165937.

190 North Canon Drive, Suite 402
Beverly Hills, CA 90201
310-432-0010

Item 2: Summary of Material Changes

Annual Update

In this Item of Checchi Capital Fund Advisers, LLC (CCFA or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment in March of 2015.

Material Changes since the Last Update

Since the last ADV Annual Amendment filing, the title of Chief Compliance Officer has been transferred from Kathryn D. Checchi to Wes Gallup.

Full Brochure Available

CCFA's Form ADV may be requested at any time, without charge by contacting Adam Checchi, Managing Member, at 310-432-0010.

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Item 4: Advisory Business

Firm Description

Checchi Capital Fund Advisers, LLC (CCFA or the Firm) is a registered investment adviser, which provides portfolio management services to investment companies registered under the Investment Company Act of 1940. CCFA also provides sub-advisory services to two insurance-dedicated funds. CCFA was founded in 2012.

Principal Owners

CCFA is owned by Loeb Capital West, LLC, Canal Capital Partners, LLC, Kinara Capital, LLC and AIF Investments, LLC.

Investment Advisory Services

CCFA serves as the investment adviser to the CCA Investments Trust, a registered investment company registered under the Investment Company Act of 1940, as amended. The CCA Investments Trust is comprised of two publicly-traded funds: the CCA Aggressive Return Fund and the CCA Core Return Fund (collectively, the Mutual Funds).

Pursuant to a separate management agreement between CCFA and the CCA Investments Trust, Checchi Capital Advisers, LLC (CCA or the sub-adviser) acts as a sub-adviser to CCFA.

CCFA, through its sub-adviser, Checchi Capital Advisers, LLC, continuously manages Fund assets based on the investment goals and objectives as outlined in the CCA Investments Trust Prospectus and Statement of Additional Information (SAI).

Interested investors should refer to Prospectus and SAI for important information regarding objectives, investments, time horizon, risks, fees, and additional disclosures. Prior to making any investment in the Funds, investors and prospective investors should carefully review these documents for a comprehensive understanding of the terms and conditions applicable for investment in the Funds.

CCFA also serves as an investment sub-adviser to two insurance dedicated funds, the CCA Core Return Insurance Fund and the CCA Aggressive Return Insurance Fund. Acting as sub-advisor, CCFA manages the Insurance Funds based on the investment goals and objectives as outlined in the Series Supplements to the Insurance Funds.

Wrap Fee Programs

CCFA does not participate in a Wrap Fee Program.

Client Assets

As of March 1, 2015 CCFA had \$39,270,480 in assets under management. All assets are managed on a discretionary basis.

Item 5: Fees and Compensation

CCFA provides investment management services to CCA Investments Trust, a registered investment company. CCFA also provides investment sub-advisory management services to two insurance-dedicated funds.

Annual investment management fees for each mutual fund are charged at 0.75% of average daily net assets. These fees are accrued daily and paid monthly in arrears. CCFA has contractually agreed to reduce its fees and to reimburse expenses, at least until March 31, 2016 to ensure that total annual Fund operating expenses after fee waiver and reimbursement (excluding 12b-1 fees and other expenses as described in the Prospectus) will not exceed 0.90% or 1.15% of average daily net assets attributable to Institutional Class or Investor Class shares, respectively. These fee waivers and expense reimbursements are subject to possible recoupment from the Fund within three years after the end of the fiscal year in which the waiver or reimbursement occurs, if such recoupment can be achieved within the foregoing expense limits.

Annual investment sub-advisory management fees for each insurance fund are charged as a tiered percent per annum of the net asset value of the insurance fund on the first business day of each calendar month based on the total assets managed (please see the Sub-Advisory Agreement for specific per annum fees by asset level). These fees are paid monthly in arrears. CCFA has contractually agreed to reduce its fees and to reimburse expenses to ensure that the total annual operating expenses (excluding standard trading expenses as described in the Series Supplement) for the insurance fund do not exceed 0.90% of the net asset value of the insurance fund on the first business day of each calendar month.

Termination of Agreement

Either party has the right to terminate any agreement without penalty with written notice. CCFA will earn fees pro-rata through the date of termination. Upon termination of the account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Item 6: Performance-Based Fees and Side-by-Side Management

Neither CCFA nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

CCFA does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

As described in Item 4, CCFA is a registered investment adviser, providing portfolio management services to investment companies registered under the Investment Company of 1940 and insurance-dedicated funds.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

As described above, all investment decisions will be made by CCFA through its sub-adviser, Checchi Capital Advisers, LLC.

Methods of Analysis

As sub-adviser, CCA combines a quantitative approach in security analysis with an index methodology to construct portfolios of securities for the Funds. CCA utilizes databases from several sources as input to its own statistical computer models. This quantitative processing produces security portfolio recommendations that capture specific market level risk exposures. CCA employs fundamental, technical and behavioral data in its computer models.

CCA's approach is not designed to capture idiosyncratic differences between companies and therefore does not provide advantage in security selection. CCA's process relies on the quality of the data it obtains, the quality of the statistical models it builds and the firm's ability to execute efficiently.

CCA Aggressive Return Fund Strategy / CCA Aggressive Return Insurance Fund Strategy

The CCA Aggressive Return Fund attempts to capture the performance of the riskier portion of the domestic and international equity and fixed income markets by employing an investment approach designed to focus on those securities that have the highest expected return sensitivity, as determined by the sub-adviser, CCA.

CCA uses a proprietary scoring algorithm to rank the world's investable equity and fixed income securities by expected return sensitivity. The algorithm uses fundamental and technical variables to score each security. The sub-adviser periodically scores and ranks the securities in its universe of the world's investable equity and fixed income securities, and divides the universe into market value deciles by score. CCA manages the CCA Aggressive Return Fund to closely approximate the key characteristics of the top decile (i.e., the 10% of the world's securities by market value that provide the highest expected return sensitivity based on the score). For this purpose, CCA invests in a sampling of securities that, in the aggregate, are selected to provide performance that corresponds generally to the performance of the top decile. The securities in the top decile will change

from time to time. As CCA conducts its periodic scoring and ranking of the universe, CCA will modify the CCA Aggressive Return Fund's holdings accordingly. The mix between equity and fixed income securities is expected to vary significantly from time to time, and it is possible for the CCA Aggressive Return Fund to be 100% invested in either asset class at any time.

CCA Core Return Fund Strategy / CCA Core Return Insurance Fund Strategy

The CCA Core Return Fund attempts to capture the performance of 90% of the domestic and international equity and fixed income markets by employing an investment approach designed to focus on all securities other than those that have the highest expected return sensitivity, as determined by the sub-adviser, CCA.

CCA uses a proprietary scoring algorithm to rank the world's investable equity and fixed income securities by expected return sensitivity. The algorithm uses fundamental and technical variables to score each security. The sub-adviser periodically scores and ranks the securities in its universe of the world's investable equity and fixed income securities, and divides the universe into market value deciles by score. CCA manages the CCA Core Return Fund to closely approximate the key characteristics of the nine deciles other than the top decile (i.e., the 90% of the world's securities by market value, excluding the 10% that provide the highest expected return sensitivity based on the score). For this purpose, CCA invests in a sampling of securities that, in the aggregate, are selected to provide performance that corresponds generally to the performance of the nine deciles. The securities in the nine deciles will change from time to time. As CCA conducts its periodic scoring and ranking of the universe, CCA will modify the CCA Core Return Fund's holdings accordingly.

More information regarding each Fund's strategies and risks are available in the CCA Investments Trust Prospectus and Statement of Additional Information (SAI).

Risk of Loss

Investing in securities involves risk of loss that investors should be prepared to bear.

Each Mutual Fund and Insurance Fund's Principal Investment Risks are outlined in the Fund's Prospectus and Series Supplement, respectively. Fund investors should work with their Financial Adviser to better understand their tolerance for risk.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying

circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

CCFA and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer, Futures and Commodities

CCA is not registered as a broker-dealer. Some of CCFA's employees are Registered Representatives of a broker-dealer, Arbor Court Capital, LLC.

Neither CCFA nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Broker-Dealer Registered Representatives

As described above, some of CCA's employees may be Registered Representative(s) of Arbor Court Capital, LLC, member FINRA/SIPC. Notwithstanding the fact that principals and associates of CCA may be Registered Representatives of Arbor Court Capital, LLC, CCA is solely responsible for investment advice rendered. Advisory services are provided separately and independently of the broker/dealer.

Registered Investment Company – CCA Investments Trust

CCFA is the registered investment adviser to the CCA Investments Trust, a registered investment company under the Investment Company Act of 1940, as amended. CCFA is also the sub-advisor to two insurance-dedicated funds.

Investment Adviser – Checchi Capital Advisers, LLC

Checchi Capital Advisers, LLC (CCA) is an affiliated investment advisor registered with the SEC, and sub-advisor to CCFA.

Other Activities

Mr. Checchi is an independent committee member for a Real Estate Private Equity Fund. Mr. Checchi serves on the Limited Partner Advisory Committee. The Advisory Committee discusses with the Managing Member any matters including, without limitation, the operating and financial results of the Fund and its Office Investments.

Other Investment Advisors

CCFA does not recommend or select other investment advisers, other than as described above.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

CCFA employees must comply with a Consolidated Code of Ethics. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Wes Gallup, Chief Compliance Officer reviews all employee trades each quarter. These reviews ensure that personal trading does not affect the markets, and that clients of CCFA receive preferential treatment.

All employees of CCFA must acknowledge the terms of the CCFA Code of Ethics at least annually.

Clients and prospective clients can obtain a copy of CCFA's Code of Ethics by contacting the Chief Compliance Officer, Wes Gallup, at 310-432-0010.

Participation or Interest in Client Transactions

Neither CCFA nor its employees recommend to the Mutual Funds or Insurance Funds or buy or sell for Mutual Fund or Insurance Fund accounts, securities in which they have a material financial interest.

Participation or Interest in Client Transactions – Personal Securities Transactions

CCFA and its employees may buy or sell securities identical to those recommended to the Mutual Funds or Insurance Funds. These trades may not occur ahead of Mutual Fund or Insurance Fund trades. The CCFA Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of CCFA will not interfere with (i) making decisions in the best interest of the Mutual Funds or Insurance Funds and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the CCFA Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of the Mutual Funds or Insurance Funds. In addition, the CCFA Code requires pre-clearance of certain transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the CCFA Code of Ethics in some circumstances would permit employees to invest in the same securities as the Mutual Funds or Insurance Funds, there is a possibility that employees might benefit from market activity by the Mutual Funds or Insurance Funds in a security held by an employee. Employee trading is continually monitored under the CCFA Code of Ethics to reasonably prevent conflicts of interest between CCFA and the Mutual Funds or Insurance Funds.

Item 12: Brokerage Practices

Soft Dollar Benefits

CCFA does not receive soft dollar benefits other than execution from broker/dealers in connection with Mutual Funds or Insurance Fund securities transactions.

Brokerage for Client Referrals

CCFA does not receive investor referrals from broker/dealers.

Directed Brokerage

CCFA, through its sub-adviser CCA, determines which securities are bought or sold for both the Mutual Funds and Insurance Funds, the amount of such securities and the timing of the purchases and sales, the broker through which transactions are effected and the commission rates or spreads paid.

Trade Aggregation

CCFA, through its sub-adviser CCA, may aggregate trades for multiple accounts. Orders for the same security entered on behalf of more than one client may be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on the following considerations: amount of cash in the account, existing asset allocation and industry exposure, risk profile, and type of security. If a partial execution is attained at the end of the trading day, CCFA will generally allocate shares on a pro rata basis, but may fill small orders entirely before applying the pro rata allocation. All clients participating in each aggregated order shall receive the average price and subject to minimum ticket charges, pay a pro-rata portion of commissions.

CCFA's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for CCFA or its employees may be included in a block trade with client accounts.

Item 13: Review of Accounts

As discussed above, the Mutual Funds are managed by CCA, the sub-adviser. CCA also manages the Insurance Funds as part of CCFA's sub-advisory services.

Reviews

Adam D. Checchi, Managing Member and Samuel T. Pfister (Director of Engineering) are the Portfolio Managers. They have the responsibility to manage the Mutual Funds and Insurance Funds in accordance with each Fund's binding documentation. This management process includes on-going oversight of each Fund's investments, buying and selling securities, and communication with investors.

Reporting

Each month, the custodian or Fund Administrator provides Fund investors with an account statement, which may include cost basis information, dividend and capital gains distributions, if any, and performance information.

Fund investors are encouraged to meet with their Financial Advisers to review their specific requirements.

Item 14: Client Referrals and Other Compensation

Other Compensation

CCFA does not receive any economic benefits (as described in Item 12) from any firm or individual for providing investment advice.

Compensation – Client Referrals

CCFA does not make or accept referral fees or any form of remuneration from other professionals when a prospect is referred to them.

Item 15: Custody

CCFA, in its capacity as investment adviser, does not retain custody of client funds or securities. Fund assets are maintained by a qualified custodian bank. The qualified custodian is responsible for safeguarding Fund assets and the Fund Administrator is responsible for sending any relevant investor statements. Investors should carefully compare any account statements they may receive from the custodian with any account statements they may receive from CCFA or the Fund Administrator.

Item 16: Investment Discretion

Through its investment management agreement and sub-advisory agreement, CCFA has the authority to determine the amount and type of securities to be held in the Mutual Funds and Insurance Funds, respectively.

Item 17: Voting Client Securities

CCFA votes proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy. Institutional Shareholder Services (ISS) votes all proxies.

Clients may contact Wes Gallup, Chief Compliance Officer at CCFA at 310-432-0010 for information about CCFA's Proxy policies.

Item 18: Financial Information

CCFA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

CCFA is not required to provide a balance sheet; CCFA does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.