



## **INVESTMENT ADVISORS, INC.**

885 Third Avenue, 31st Floor  
New York, NY 10022  
**1(855) 299-1980**

December 8, 2015

### **FORM ADV PART 2 BROCHURE**

**This brochure provides information about the qualifications and business practices of Siebert Investment Advisors, Inc. ("Siebert" or "SIA"). If you have any questions about the contents of this brochure, please contact customer service at 855.299.1980. 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 Siebert Investment Advisors Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Siebert Investment Advisors Inc. is 169231.**

**Siebert Investment Advisors Inc. is required to be registered as an Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## ***ITEM 2 - MATERIAL CHANGES***

The purpose of this page is to inform you of any material changes since the previous annual update to this brochure. If you are receiving this brochure for the first time this section may not be relevant to you.

Siebert reviews and updates the brochure at least annually to confirm that it remains current. This brochure is dated December 8, 2015.

Material changes since the prior issuance of the brochure are:

- The section entitled Item 4 – Advisory Business has been revised primarily to remove Siebert Brandford Shank & Co, LLC as an affiliated entity, disclose conflicts of interest and to reflect that Siebert ceased providing merger & acquisition services.
- The section entitled Item 5 - Fees and Compensation has been revised to more clearly state that Management Fees are on a negotiated basis.
- The section entitled item 10 – Other Financial Industry Activities and Affiliations has been revised primarily to remove Siebert Brandford Shank & Co, LLC as an affiliate and disclose conflicts of interest.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to the 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 will also provide other ongoing disclosure information about material changes as necessary, without charge.

We will provide you with a new Brochure as necessary based on changes or significant new information, at any time, without charge. You may also request a copy of this brochure free of charge by contacting Siebert by telephone at 855.299.1980.

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## **ITEM 4 - ADVISORY BUSINESS**

Siebert is a registered investment adviser which began conducting business in 2014. As of March 31, 2014 Siebert had approximately \$36.3 million in assets under management - approximately \$5.4 million of which were managed on a discretionary basis and approximately \$30.9 million of which were managed on a non-discretionary basis. Siebert does not sponsor or manage a wrap fee program. Siebert's mission is to provide clients with investment strategies for all market conditions.

Siebert is affiliated with one (1) broker-dealer:

- Muriel Siebert & Co., Inc. - a registered broker dealer since 1967.

Owners and Officers are as follows:

<b>Name</b>	<b>Status</b>	<b>Date Status Acquired MM/YYYY</b>	<b>Ownership</b>	<b>Control Person</b>	<b>CRD No. or IRS Tax ID No.</b>
Joseph M. Ramos	President, Chief: Operating Officer, Financial Officer, Investment Officer	07/2013	None	Yes	2065829
SIEBERT FINANCIAL CORPORATION	NASDAQ Exchange listed Public Holding Company. Symbol "SIEB"	09/2013	100%	Yes	11-1796714
Joseph P. Giordano	Chief Compliance Officer	04/2015	None	No	2766544

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

Siebert offers advice to clients regarding asset allocation and the selection of investments. Our investment management services include the design, implementation, and monitoring of client accounts on a discretionary or non-discretionary basis. Investment selections/recommendations are guided by the stated objectives of the Client; other considerations include the Client's risk profile and financial status.

Joseph Ramos, the principal of Siebert, and certain other staff of Siebert are also separately licensed as registered representatives of the affiliate broker-dealer. Joseph Ramos has authority over the vetting of the investment products and services, determining asset allocations, the hiring practices of Investment Advisory Staff, Portfolio Managers, Independent Managers, Sub-Advisors, and the nature and type of products and services to be offered through Siebert to its clients. Joseph Ramos is also the Chief Financial Officer of the affiliate broker dealer and Siebert Financial Corporation, the public holding company, which is an apparent conflict of interest.

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

### **Investment Management Services**

Clients can engage Siebert to manage all or a portion of their assets on a discretionary or non-discretionary basis. With regard to portfolio management services, Siebert offers its primary services pursuant to two types of investment strategies: fundamental and technical analysis as described further in Item 8. Siebert primarily provides its services to individuals.

Siebert offers to its clients a number of asset management programs ("Managed Programs") consisting of asset allocation, flexible asset management and focused or completion strategies where Siebert may engage Independent Managers, as described below. Financial Advisers will assist each client in reviewing information about the programs, completing a client questionnaire to determine the client's risk tolerance, financial situation and investment objectives and selecting an investment strategy. Siebert generally does not act as portfolio manager directly, as Siebert selects other investment advisers to act as either the portfolio manager or sub-advisor on behalf of its clients.

As further discussed in Item 8, Siebert primarily allocates clients' investment management assets among mutual funds, exchange-traded funds ("ETFs"), individual securities, and Independent Managers (as defined below), in accordance with the investment objectives of the client. Siebert also provides advice about any type of investment held in clients' portfolios.

Siebert tailors its advisory services to the individual needs of clients. Siebert consults with clients initially and has periodic follow-up contact (generally no less than annually) to determine risk tolerance, time horizon and other factors that may impact the clients' investment needs. Siebert strives to ensure that clients' investments are appropriate for their investment needs, goals, objectives and risk tolerance.

Clients are advised to notify Siebert if there are changes in their financial situation or investment objectives, or if they wish to impose any reasonable restrictions upon Siebert' management services. Clients may impose reasonable restrictions or mandates on the management of their account if, in Siebert' sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

### **Use of Independent Managers**

Siebert recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain independent sub-advisers, portfolio managers, managers and investment managers (collectively referred to as "Independent Managers"), based upon the stated investment objectives of the client. The terms and conditions under which the client engages the Independent Managers are set forth in a separate written agreement between Siebert or the client and the designated Independent Managers. Siebert renders services to the client relative to the discretionary selection of Independent Managers.

Siebert periodically monitors and reviews the account performance and the client's investment objectives. Siebert receives an annual advisory fee, which is negotiated with the client(s), and is based upon a percentage of the market value of the assets being managed by the designated Independent Managers. Siebert retains one or more independent third party manager providers

who either sponsor and/or participate in wrap fee programs to utilize the investment managers on their platforms.

When selecting an Independent Manager for a client, Siebert makes their recommendation based on one or more factors, including the amount of assets the prospective client intends to invest. Siebert contracts to have two officers of Palladium, LLC to be Members of the Siebert Investment Committee. Palladium, LLC is an Independent Manager of Siebert and having two of Palladium, LLC's officers on the Siebert Investment Committee is an apparent conflict of interest.

Information about the Independent Manager, such as the Form ADV, disclosure brochure and/or material supplied by the Independent Manager or independent third parties that may be utilized to obtain a description of the Independent Manager's investment strategies, past performance and risk profile to the extent available. Factors that Siebert considers in recommending an Independent Manager include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research.

As discussed above, the client may incur fees additional to those charged by Siebert by the designated Independent Managers, the corresponding broker-dealer and/or custodian. Certain Independent Managers may impose more restrictive account requirements and varying billing practices than Siebert. In such instances, Siebert may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

It is the clients' ongoing responsibility to timely communicate with the Financial Advisor, any changes to their financial situation or status, which may affect the appropriateness of the client's particular portfolio. Siebert will devote its best efforts with respect to its management of its client accounts. In addition, the Financial Advisor will periodically either call and/or email the client.

Clients shall be provided a copy of the Form ADV Part 2 written disclosure brochure at the time the account is established for Siebert and if applicable, the client also receives the written disclosure brochure of the designated Independent Manager. In addition, clients may contact Siebert to obtain an additional copy of the Form ADV Part 2 brochure or they may obtain one online at the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Managed Account Program**

Siebert has entered into investment agreements with one or more Independent Managers, to offer the following programs on a discretionary basis as sub-advisers to Siebert clients. Under the current agreements National Financial Services, LLC ("NFS") serves as account custodian for client assets and the sub-advisers may provide Siebert with:

- advice and the sub-adviser has the ability on its own to adjust asset allocations, add, remove or replace securities in the account, and rebalance the account as it deems necessary. The sub-adviser may also provide advice related to program design and support, including the structure and design of asset allocation portfolios and underlying investment research on Separately Managed Accounts ("SMAs"), which are portfolios of individually owned securities managed by an asset manager and that are often referred to as "sub-managers", mutual funds and Exchange-Traded Funds ("ETFs") that may be available within this program.
- advice and it has the ability on its own to adjust asset allocations, add, remove or replace assets among no-load mutual funds and provides Siebert with ongoing asset

management support services to achieve the goals of the asset allocation strategy chosen by the client; and,

- a personalized distribution strategy, which is intended to provide the client with a stream of periodic distributions, consisting of two elements: an actively managed cash liquidity reserve (a money market fund or other short term investment vehicle) and a portfolio of mutual funds selected based upon each client's asset allocation strategy. The client determines the amount of each periodic distribution.

### **Managed Account Solutions Program (“MAS”)**

MAS is a service provided to Siebert by NFS via a quad party agreement between Siebert, affiliate broker dealer MS & Co., unaffiliated entities, NFS and a third-party registered investment advisor that is a wrap fee program sponsor to the MAS. Investment advisory and platform management services available through MAS are provided to Siebert. NFS provides custody, clearing, and other non-investment advisory services under the MAS. In addition, Siebert is provided with performance reports, money manager monitoring, evaluation and other tools to assist Siebert with providing on-going investment management services to its clients. Siebert may also select additional or terminate existing relationships with Independent Managers from those available on MAS.

## ***ITEM 5 - FEES AND COMPENSATION***

Siebert offers its services on a fee basis based upon assets under management. The Fees are negotiated with the client(s) and lower fees for comparable services are available from other sources.

### **Investment Management Fee**

Siebert provides investment management services for an annual fee based upon a percentage of the market value of the assets being managed by Siebert. Siebert's annual fee is negotiable/negotiated (with the client), is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which, depending on the negotiated agreement, may be incurred by the client. If the Client selects NFS (the clearing and carrying broker of Siebert's affiliated broker dealers) as their custodian, the Siebert affiliate may receive a portion of these commissions, fees, and costs.

Siebert's annual investment advisory fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by Siebert on the last day of the previous quarter. The client will pay a fee which will cover the advisory management fee for Siebert and any Independent Manager Fee. Siebert's portion of the investment advisory fee charged may be larger than that of the Independent Manager. Each client shall sign an Investment Advisory Agreement that details the responsibilities of Siebert and the Client. Siebert does not have the authority to deduct fees without prior client approval.

The following details the fee structure and compensation methodology for investment management:

### **Portfolio Management**

For services provided by Siebert, Investment Advisory Fees are on a negotiated basis and are paid quarterly in advance on the last day of the previous quarter end pursuant to the terms of

the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of the assets under management at the end of each calendar quarter and the fees are negotiated with the client. Lower fees for comparable services are available from other sources. The Investment Advisory Fee schedule is the starting point for the client to negotiate from and is as follows:

1.50% on the first \$500,000  
1.25% on the next \$500,000  
1.10% on the next \$1,000,000  
1.00% on the next \$3,000,000  
0.75% on assets in excess of \$5,000,000

**Investment Advisory Fees are negotiated with the client.**

The Fee Schedule above is the starting point of the negotiation. As such, Siebert negotiates fees with the client(s) and may charge a lesser management fee than is what is listed in the Fee Schedule immediately above.

Clients provide written authorization either as part of the Investment Advisory Agreement, or separately, permitting Siebert, the independent manager or third party manager provider or their custodian to deduct Siebert and client's manager's fees directly from the client's account and remit to the respective parties. Investment Advisory Fees can also be paid by check. The amount due is calculated by applying the quarterly rate to the total assets under management with Siebert at the end of the prior quarter. The Client's fees will take into consideration the aggregate assets under management with the advisor.

Any Investment Advisory Fee deducted from the clients account will appear on the clients account statement from NFS, custodian. In addition, at the client's request Siebert will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

**Fees for Management during Partial Quarters of Service**

Investment Advisory Fees for the initial period or the first quarter of service are calculated on a pro rata basis from the inception date of the account to the end of the first quarter. If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets may be adjusted on a pro rata basis for deposits and/or withdrawals occurring within such quarter and will be calculated in accordance with the advisory agreement based on the days remaining in the quarter.

The Agreement between Siebert and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. Siebert' fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Clients may make additions to and withdrawals from their account on notice to Siebert subject to the usual and customary securities settlement procedures, and subject to Siebert' right to terminate an account. Additions may be in cash or securities provided that Siebert reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Siebert designs certain of its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Siebert may consult with its clients about the options and ramifications of transferring securities. However, clients are



advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications. Siebert prohibits clients from self-directing trading in their managed account.

### **Fees Charged by Financial Institutions**

As further discussed in response to Item 12 (below), Siebert generally recommends that clients utilize the brokerage and clearing services of National Financial Services LLC ("NFS") for investment management accounts. Siebert may only implement its investment management recommendations after the client has arranged for and furnished Siebert with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to, NFS, or any other broker-dealer recommended by Siebert, broker-dealer directed by the client, trust companies, banks etc. (collectively referred to herein as the "Financial Institutions").

Clients may incur certain charges imposed by the Financial Institutions and other third parties such as fees charged by Independent Managers, custodial fees, charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to Siebert's fee. In addition to the transactional charges described above, clients may also pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses). Clients should review the ADV brochures of any third party managers for details about any additional fees they charge.

## ***ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT***

Siebert does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Siebert has no performance-based fee accounts, it has no side-by-side management.

## ***ITEM 7 - TYPES OF CLIENTS***

Siebert generally provides investment advice to individuals, high net worth individuals, families, trusts, corporations and business entities.

### **Minimum Account Size**

Siebert generally imposes a minimum account size of \$100,000 although this requirement may be waived from time to time at our discretion. Certain Independent Managers may impose more restrictive account requirements and varying billing practices than Siebert. In such instances,

Siebert may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

## ***ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS***

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

Siebert generally offers an investment program that provides a series of mutual fund and ETF and individual equities model portfolios (generally for accounts custodied at NFS).

For its portfolio program at NFS, Siebert offers multiple model portfolios ranging from conservative to aggressive which are primarily invested in mutual funds. Additionally, Siebert may build custom portfolios for clients, taking into account goals, risk profile, temperament, etc.

When developing and implementing a portfolio invested primarily in mutual funds, Siebert uses a fundamental analysis. This analysis involves an evaluation and comparison of various mutual fund characteristics, including fund objectives, performance history, management style, independent rating and ranking, adherence to stated objectives, portfolio statistics, experience and tenure of management team and contribution to desired overall portfolio diversification. The analysis may also account for perceived analysis of market and economic environment. The primary risk in using fundamental analysis relative to mutual funds is that markets may behave differently than they did in the periods during which the funds were evaluated. Further, any perceived analysis of market and economic conditions may prove incorrect.

When developing and implementing a portfolio invested primarily in individual equities and ETFs, Siebert may use a form of technical analysis. Such analysis may involve the use of historical statistics to identify market tendencies, trends and opportunities. These are not based on the fundamental condition of any company or companies. The primary risk in using technical analysis is that such historical tendencies, trends and opportunities may not repeat in the future, regardless of the robustness of the statistics or analysis. Further, even if the trends, tendencies or opportunities do eventually recur, there is no guarantee that Siebert will be able to capitalize on those recurrences.

### **Selection of Independent Managers**

Siebert may employ various investment evaluation strategies to select Managers and/or Sub-Advisors. To date, Siebert has not replaced existing and/or selected new Managers and/or Sub-Advisors. Siebert continues to provide clients with portfolios from the initial two (2) Sub-Advisors: Palladium, LLC and Brinker Capital, Inc. Further, the agreement between Siebert and Palladium, LLC includes compensation and retention of the services of two (2) of the Palladium, LLC Investment Officers to provide Investment Officer services to Siebert, which is an apparent conflict of interest. As such, Palladium, LLC and its two (2) Officers providing such Investment Officer services to Siebert may not be considered independent.

When considering a new Independent Manager and/or evaluating an existing Manager or Sub-Advisor, the methods of analysis utilized will be quantitative and qualitative in nature and may vary by each strategy and manager for funds managed. Siebert typically seeks investment managers that it believes will deliver attractive risk adjusted returns over the investment horizon based on a quantitative and qualitative assessment of the manager's track record, investment strategy, and trading and investing methodology. Siebert may perform qualitative peer analysis

comparisons of each manager and also perform quantitative analysis including optimization analysis to build a portfolio of various managers and instruments.

Qualitative analysis of managers and strategies are inherently subjective. There is no guarantee that the advisor would be correct in assessing the attributes of a manager or strategy going forward. Qualitative analysis is largely dependent on past results and assumes that past results and relationships (i.e. correlations between managers, etc.) are indicative of future relationships. This would be the case if a manager changes their investment philosophy over time. Siebert generally seeks diversification in the types of securities managers selected for investment. Certain investments may be illiquid and/or not have a ready market to sell.

Please refer to the Form ADV of the third party, as applicable, for Palladium, LLC or any other third party manager provider for additional information.

## **Risks of Loss**

### **Risks Associated with Certain Investments Used in the Products**

It is important to remember that all investments carry at least some degree of risk. Risk may include loss of some, or even all, of your investment. No particular type of investment, or approach to investing, is guaranteed to perform well, and there may be other investment vehicles, portfolio managers or approaches not offered by Siebert that may perform as well or better. You should consider these factors carefully before deciding to invest and be prepared to bear losses. Stocks generally fluctuate in value more than bonds and may decline significantly over short time periods. There is the chance that stock prices overall will decline because stock markets tend to move in cycles, with periods of rising prices and falling prices. The value of a stock may decline due to general weakness in the stock market or because of factors that affect a company or a particular industry.

### **Management Risk**

Siebert investment products are subject to management risk because each account is an actively managed portfolio. Siebert, Palladium, LLC and/or any other third party manager provider's management practices and investment strategies might not produce the desired results.

### **Market Risk**

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

The prices of the securities and securities products in which Siebert, Palladium, LLC and/or any other third party manager provider may invest and strategies each may recommend may decline for a number of reasons including in response to economic developments, factors relating to the company, and market activity.

### **Adjustable Rate and Floating Rate Securities Risks**

Although adjustable and floating rate debt securities tend to be less volatile than fixed-rate debt securities, they nevertheless fluctuate in value.

### **Alternative Investments and Derivatives**

Certain mutual funds used in product may invest in alternative investments strategies or derivatives that are often more volatile than other investments and may magnify the vehicle's

gains and losses. A derivative is a security or contract (futures, options etc.) the value of which fluctuates with the value of another security (i.e., its value is “derived” from the value of another). An investment vehicle that uses derivatives could be negatively affected if the change in market value of its securities fails to correspond as expected to the underlying securities.

Alternative investment products are not for everyone and entail risks that are different from more traditional investments. Alternative investment strategies are intended for sophisticated investors and involve a high degree of risk, including, among other things, the risks inherent in investing in securities and derivatives, using leverage, and engaging in short sales. An investment in an alternative investment product or strategy may be considered speculative and should not constitute a complete investment program. Diversification and strategic asset allocation do not assure a profit or protect against loss in declining markets.

The potential for a commodity investment vehicle to use derivative instruments, such as futures, options, and swap agreements, to achieve its investment objective may create additional risks that would not be present in the underlying securities themselves, thus raising the potential for greater investment loss.

### **Concentration Risk**

Portfolios that invest a significant portion of assets in a small or limited number of securities, a single specific or closely-related sectors, industries, a specific region or country, may involve greater risks, including greater potential for volatility, than more diversified portfolios. The value of these holdings will vary considerably in response to changes in the market value of the securities that represent these sectors, industries, or regions.

### **Covered Calls**

Mutual funds that engage in the selling (or writing) of covered calls may involve a high degree of risk and may not be suitable for all investors. For a call option that is sold (written), if that option is exercised, the upside potential is limited to the premium received plus the difference between its stock price and the stock purchase price. If the option is not exercised and expires out-of-the-money and with no value, the upside potential is any gain in share value plus the premium received. On the downside, limited protection is provided by the premium received from the call's sale. The loss potential may be substantial and is limited only by the stock declining to zero. Investors should read and understand the risks associated with options prior to engaging in any covered call strategy. These risks are more fully described in the booklet entitled “The Characteristics & Risks of Standardized Options”, which can be accessed at [www.optionsclearing.com](http://www.optionsclearing.com).

### **Credit Risk**

The issuers of the bonds and other debt securities held in products offered through Siebert may not be able to make interest or principal payments.

### **Currency Risk**

If invested in non-U.S. securities, Siebert products are subject to the risk that foreign currencies will decline in value relative to the U.S. dollar, or, in the case of hedging positions, that the U.S. dollar will decline in value relative to the currency being hedged.

### **Exchange-Traded Notes**

Exchange-Traded Notes are a type of senior, unsecured, unsubordinated debt security of the issuing company. This type of debt security differs from other types of bonds and notes because ETN returns are generally based upon the performance of a market index minus applicable fees, no periodic coupon payments are distributed and no principal protection exists. Similar to

ETFs, ETNs are generally traded on a securities exchange. Investors can also hold the debt security until maturity. At that time, the issuer is obligated to give the investor a cash amount that would be equal to the principal amount times the applicable index factor less investor fees.

The index factor on any given day is a mathematical equation equal to the closing value of the underlying index on that day divided by the initial index level. ETNs are subject to credit risk and liquidity risk that impact the price received upon disposition of the notes. Additional risks of investing in ETNs include limited portfolio diversification, price fluctuations, issuer default, uncertain principal repayment, and uncertain federal income tax treatment. The performance of the ETNs may vary from the actual performance of the underlying index and the performance of the underlying index components. By investing in ETNs, the owner does not have certain rights that investors in the underlying index or the underlying index components may have, such as stock voting rights.

### **Foreign Securities Risk**

Siebert clients may invest a significant portion of assets in securities of foreign issuers denominated in U.S. dollars, including issuers in emerging markets. Foreign economies may differ from domestic companies in the same industry. Foreign economies may differ from domestic companies in the same industry. Investment in emerging markets involves additional risks, including less social, political and economic stability, smaller securities markets and lower trading volume, restrictive national policies and less developed legal structures.

### **Foreign Securities and Emerging Markets Risk**

The value of foreign investments offered through Siebert may be adversely affected by changes in the foreign country's exchange rates, political and social instability, changes in economic or taxation policies, decreased liquidity and increased volatility. Foreign companies may be subject to less regulation than U.S. companies. Investment in emerging markets involves additional risks, including less social, political and economic stability, smaller securities markets and lower trading volume, restrictive national policies and less developed legal structures.

### **General Risk of Loss**

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

### **Gold**

Approved Siebert clients may invest in ETFs that invest in gold bullion. Several factors affect the price of gold, including: global supply and demand; global or regional political, economic or financial events and situations; investors' expectations with respect to the rate of inflation; currency exchange rates and interest rates. There is no assurance that gold will maintain its long-term value in terms of purchasing power in the future. The price of gold has fluctuated widely over the past several years and may experience significant volatility.

### **Government-Sponsored Entities Risk**

Approved Siebert clients may invest in securities issued or guaranteed by government-sponsored entities, including GNMA, FNMA and FHLMC. However, these securities may not be guaranteed or insured by the U.S. Government and may only be supported by the credit of the issuing agency.

### **Interest Rate Risk**

In general, the value of bonds and other debt securities falls when interest rates rise. Longer term obligations are usually more sensitive to interest rate changes than shorter term obligations.

**Liquidity Risk**

Low or lack of trading volume may make it difficult to sell securities held in the PIPs product at quoted market prices.

**Long/Short Positions**

Investment vehicles, such as mutual funds and ETFs, used in the Strategies may employ the use of long and short positions, which may involve risks different from those normally associated with other types of investment vehicles. It is possible that the fund's long positions will decline in value at the same time that the value of the securities sold short increases, thus raising the potential for greater investment loss. Market neutral investing, in using long and short positions, provides no guarantee that it will be successful in limiting the fund's exposure to domestic stock market movements, capitalization, sector swings or other risk factors. Investment in a strategy involved in long and short selling may have higher portfolio turnover rates, which may result in additional tax consequences. Short selling involves certain risks, including additional costs associated with covering short positions and a possibility of unlimited loss on certain short sale positions.

**Mutual Funds and ETFs**

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for index-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

**Portfolio Turnover Risk**

A high portfolio turnover rate (100% or more) has the potential to result in the realization and distribution to shareholders of higher capital gains, which may subject you to a higher tax liability. A high portfolio turnover rate also leads to higher transactions costs.

## **REITS**

Issuer risk Investments in REITs are subject to many of the risks associated with direct real estate ownership and, as such, may be adversely affected by declines in real estate values and general and local economic conditions.

### **Risks Associated with High Yield Securities**

Approved Siebert clients may invest in high yield securities. Securities with ratings lower than BBB or Baa are known as “high yield” securities (sometimes referred to as “junk bonds”). High yield securities provide the potential for greater income and opportunity for gains than higher-rated securities but entail greater risk of loss of principal.

### **Risks Associated with Inflation and Deflation**

Inflation risk is the risk that the rising cost of living may erode the purchasing power of an investment over time. Deflation risk is the risk that prices throughout the economy decline over time – the opposite of inflation.

### **Risks Associated with Mortgage-Backed Securities**

These include Market Risk, Interest Rate Risk, Credit Risk, Prepayment Risk as well as the risk that the structure of certain mortgage-backed securities may make their reaction to interest rates and other factors difficult to predict, making their prices very volatile. In particular, the recent events related to the U.S. housing market have had a severe negative impact on the value of some mortgage-backed securities and resulted in an increased risk associated with investments in the securities.

### **Use of Independent Managers**

Siebert may recommend the use of Independent Managers for certain clients. Siebert will continue to do ongoing due diligence of such managers, but such recommendations rely, to a great extent, on the Independent Managers ability to successfully implement their investment strategy. In addition, Siebert does not have the ability to supervise the Independent Managers on a day-to-day basis other than as previously described in response to Item 4, above.

### **Small- and/or Mid-Cap issuer risk**

Small and midsize companies carry additional risks because the operating histories of these companies tend to be more limited, their earnings and revenues less predictable (and some companies may be experiencing significant losses), and their share prices more volatile than those of larger, more established companies. The shares of smaller companies tend to trade less frequently than those of larger, more established companies, which can adversely affect the pricing of these securities. These companies may have limited product lines, markets or financial resources, or may depend on a limited management group. Some investments will rise and fall based on investor perception rather than economic factors. Other investments are made in anticipation of future products, services or events whose delay or cancellation could cause the stock price to drop.

## ***ITEM 9 - DISCIPLINARY INFORMATION***

Siebert is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Siebert either has currently, or has had in the past one or more Financial Advisers, Sub-Advisors and/or their Officers with disclosable events.

## **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Siebert is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. Siebert has disclosed such information below. Siebert is not a registered broker dealer, but its management persons and staff are registered as either registered representatives, principals and/or Officers with one or more of its affiliate broker-dealers as listed below. Siebert is not a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing.

### **Affiliate Broker-Dealer**

Muriel Siebert & Co. Inc. (CRD # 5376) - is an affiliate broker-dealer that has been registered since August 8, 1969.

Joseph Ramos, CFO, Chief Investment Officer, Chief Operating Officer and President is also the CFO of the affiliated broker-dealer and the public holding company Siebert Financial Corporation. Siebert has management, Financial Advisers, Supervised Persons and Staff that are registered representatives, Staff and Management of Muriel Siebert & Co. Inc. ("MS & Co"). Both Siebert and MS & Co are wholly owned subsidiaries of Siebert Financial Corporation. Siebert Financial Corporation is a public holding company traded on NASDAQ under the symbol SIEB.

### **Financial Industry Affiliations, Affiliate Compensation, Fees, Revenue and Profit Sharing**

Affiliates of Siebert may refer Consultants, Co-Sponsors, or Sub-Advisers to Siebert. Siebert shall make an independent determination as to whether to do business with such entities. Affiliates of Siebert may also have business arrangements with Consultants, Co-Sponsors, Custodians or Sub-Advisers that may indirectly benefit from such entities' business with Siebert. Siebert does not receive any additional compensation from third party advisers.

### **Custodians**

Siebert contracts with one (1) custodian, NFS, via a carrying and clearing agreement between NFS and Siebert's affiliate broker-dealer MS & Co. NFS is not an affiliate of Siebert. NFS custodies client assets and performs administrative account services, including issuing statements to the clients.

### **Affiliates, Other Affiliates, Affiliate Holding Companies and Outside Directorships and/or Outside Officers**

Joseph M. Ramos, see the affiliate Broker-Dealer section of this item, above.

Outside Officers Donald Robinson and David Feldman (Co-Chief Investment Officers of Palladium, LLC, a Sub-Adviser utilized by Siebert) are Members of Siebert's Investment Committee and receive compensation for such services.

Siebert Officers, Financial Advisers, Supervised Persons, Staff and/or family member(s) may invest with Siebert, and may have their personal accounts at MS & Co, affiliate broker-dealer.

### **Fees from Independent Managers**

As discussed above, Siebert recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain Independent Managers. In



certain circumstances Siebert' compensation is included in the advisory fee charged by such Independent Managers. There may be a conflict of interest to choose Independent Managers where Siebert receives a bigger portion of the Independent Managers' fee. Siebert has instituted procedures to ensure that any recommendations are made in the best interest of its clients.

## ***ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING***

Siebert has adopted its Investment Advisory Compliance Program (the "Program"), pursuant to Rule 206(4)-7 under the Investment Advisers Act of 1940 ("Advisers Act"). Part of that program includes the adoption of written policies and procedures, which are incorporated within Siebert's Compliance Manual. Siebert employees are required to abide by the Code of Ethics and Siebert's overall Compliance Program, which is amended periodically to reflect additional policies and/or changes in regulations.

### **Code of Ethics and Personal Trading**

Siebert has adopted a Code of Ethics ("Code") and provides a copy to any clients and prospective clients upon request. The Code is updated periodically, as necessary, and distributed to all personnel. The Code sets out our standard of conduct of investment advisory personnel. Siebert expects each of its employees, financial advisers and management (collectively referred to as, "Employees") to conduct themselves with integrity, honesty and professionalism. To provide general guidance, Siebert requires each Employee to comply with the principles and standards of conduct contained in the Code of Ethics which includes standard of business conduct, safeguards to confidential information, including the fiduciary and confidential duty of personnel, trading and gift policies, reporting and record-keeping obligations, and avoidance of conflicts of interest. Prohibitions to certain practices such as hot issues and insider trading, protection of material nonpublic information and procedures for monitoring personal securities trading.

Siebert and persons associated with Siebert ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with Siebert' policies and procedures. Siebert' Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by Siebert or any of its associated persons. The Code of Ethics also requires that certain of Siebert' personnel (called "Access Persons") report their personal securities holdings and transactions and are prohibited from participating in initial public offerings of equity or equity related securities unless otherwise approved by the compliance department and/or the Investment Committee. Under certain circumstances, exceptions may be made to the policies stated herein.

In order to monitor personal securities trading, Employees are required to follow reporting procedures including arrangement for the compliance department to receive duplicate monthly confirmations or account statements, which are reviewed.

Siebert provides each Employee with a copy of the Code of Ethics and any amendments thereto and obtains written acknowledgment of receipt of the Code of Ethics from each of the Employees on an annual basis. Violations of the Code of Ethics are required to be reported promptly to Siebert's Chief Compliance Officer.

Siebert (and its officers and employees) and certain Affiliates (and their respective officers and employees) may recommend to their respective clients' investment vehicles in which Siebert or such Affiliate has a financial interest by virtue of management fees associated with such investments. Certain control individuals and/or access persons may, subject to applicable compliance policies, invest in products alongside outside investors. The conflicts inherent in such an investment are mitigated in part due to the fact that investors are affected in proportion to their investment, including the control individuals. Typically outside investors may gain comfort by the fact that a control person is also invested and as such is also affected by the gains and losses of such investment.

These rules and/or restrictions are designed to protect Siebert's Clients. All officers and employees are required to put the interests of the Clients first in all dealings relating to the Client and their investments.

### **Privacy Policy**

Siebert protects your personal information and has adopted a privacy policy. A copy of the Siebert privacy policy is provided to clients when the account is established, whenever there is a change to the privacy policy, on an annual basis and upon request. The privacy policy can also be viewed on our website at [www.siebertadvisors.com/legal/Privacy-Policy](http://www.siebertadvisors.com/legal/Privacy-Policy)

### **Business Continuity**

Siebert has adopted a business continuity plan which was developed by its affiliate broker-dealer MS & Co. Siebert's strategy is to maintain critical functions in the event of circumstances, which impact our physical plants, applications, data centers or networks. Siebert, through its affiliate has engaged in planning and process development to reduce risk in this area. You may request a copy of the business continuity statement by calling customer service at 855.299.1980.

### **Risk Management Review**

The Investment Committee is also the Risk Management Committee provides oversight of investment management and operational policies and procedures including a scheduled review designed to mitigate key risks.

## ***ITEM 12 - BROKERAGE PRACTICES***

As discussed above, in Item 5, Siebert generally recommends that clients utilize the brokerage and clearing services of NFS.

Some factors which Siebert considers in recommending NFS, or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. NFS enables Siebert to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by NFS may be higher or lower than those charged by other Financial Institutions.

If charged, the commissions paid by Siebert' clients comply with Siebert' duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where Siebert determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, 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 a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Siebert seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Siebert periodically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Siebert does not permit clients to direct brokerage in the managed account(s). Siebert may utilize its affiliate broker-dealer MS & Co. for trade execution and support services and NFS, as the clearing agent and custodian.

The client may direct Siebert in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and Siebert will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Siebert (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Siebert may decline a client's request to direct brokerage if, in Siebert's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless Siebert decides to purchase or sell the same securities for several clients at approximately the same time. Siebert may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Siebert's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among Siebert's clients pro rata to the purchase and sale orders placed for each client on any given day.

In the event that Siebert determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, Siebert may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist Siebert in

its investment decision-making process. Such research generally will be used to service all of Siebert' clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Siebert does not have to produce or pay for the products or services.

#### **Soft Dollars Software and Support Provided by Financial Institutions**

Siebert does not engage in soft dollars and therefore does not obtain research or other products or services with soft dollars. Siebert may receive from either NFS and/or Siebert affiliates, without cost to Siebert, computer software and related systems support, which allow Siebert to better monitor client accounts maintained at NFS. Siebert may receive the software and related support without cost because Siebert renders investment management services to clients that maintain assets at NFS and/or accounts with Siebert. The software and support is not provided in connection with securities transactions of clients (i.e. not "soft dollars"). The software and related systems support may benefit Siebert, but not its clients directly. In fulfilling its duties to its clients, Siebert endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Siebert' receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Siebert' choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, Siebert may receive the following benefits from NFS: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that generally services its introducing broker-dealers that have clearing arrangements with NFS; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to a password protected online electronic communication network for clients to access account information.

#### **Referrals**

Siebert does not use client brokerage to reward brokers for client referrals.

Siebert may receive referrals from its affiliate broker-dealers but no compensation is paid for such referrals.

#### **Trade Errors**

As a fiduciary, Siebert endeavors to act in its clients' best interests. In the event of a trade error resulting in a gain where the Firm has control over its allocation, we shall proceed with a course of action favorable to the client.

## ***ITEM 13 - REVIEW of ACCOUNTS***

#### **Account Reviews**

The Siebert Investment Committee has policies and procedures to monitor an account's holdings. The Investment Committee Members are: Joseph M. Ramos (Chief Investment Officer), Peter Sosnowski, Siebert financial adviser, Donald Robinson and David Feldman (Investment Officers of Palladium, LLC, a Sub-Adviser).

The Investment Committee obtains various levels of transparency from managers to which it allocates. Investment advisory clients are encouraged to discuss their needs, goals, and objectives with Siebert and to keep Siebert informed of any changes thereto. Siebert contacts ongoing investment advisory clients at least annually to review its previous

services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular monthly account statements directly from the broker-dealer or custodian for the client accounts. Siebert may, from time to time, elect to provide clients with written quarterly performance reports generally sourced from or through the custodian. Such quarterly performance reports would be in addition to the custodian's monthly account statements.

Siebert may review client accounts more frequently than the periodic reviews described in this Brochure. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

While there are no restrictions on your ability to contact and consult with the third party adviser personnel, it is generally preferred that you do so through, or together with your Siebert financial adviser.

#### **Unfunded Account Termination**

If your account has a zero balance for more than six months, Siebert will terminate your advisory agreement. Your underlying brokerage account, however, will remain open, unless terminated by the custodian. Once an advisory account has been terminated, Siebert will not be held responsible for account trading delays and Siebert will not provide any communications to you or your Registered Investment Adviser. New account paperwork and/or other procedures for reactivating the account may be required.

### ***ITEM 14 - CLIENT REFERRALS and OTHER COMPENSATION***

Siebert is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, Siebert is required to disclose any direct or indirect compensation that it provides for client referrals. Siebert does not have any required disclosures to this Item.

Siebert does not currently compensate others directly or indirectly for Client Referrals or provide any other compensation for such activities. Siebert does not receive any compensation from third parties for investment advice or other advisory services to our clients. Currently, Siebert does not have any solicitor arrangements.

Siebert may in the future enter into an arrangement to receive economic benefits from non-clients for providing advice or other advisory services to clients. This type of relationship would pose a conflict of interest and as such would be disclosed in response to Item 12, above.

### ***ITEM 15 - CUSTODY***

The Siebert' Agreement and/or the separate agreement with any Financial Institution may authorize Siebert through such Financial Institution to debit the client's account for the amount of Siebert' fee and to directly remit that management fee to Siebert in accordance with applicable custody rules.

Siebert does not have physical custody of client assets or provide custodial services. In order to use our services, you must establish a custodial account with another institution. NFS is

currently the only custodian available to clients directly through Siebert. The advisor has not and will not seek to add or change a custodian without the clients' prior approval.

You will generally receive custodial account statements about portfolio holdings at least monthly directly from the custodian that maintains your funds and securities. You are encouraged to carefully review the custodial account statements you receive from the custodian and promptly report any errors or omissions to the custodian at the number listed on the account statement and to Siebert. You may contact Siebert Client Service by calling 855.299.1980 during regular business hours.

It is Siebert's policy that it does not advise, initiate or take any other action on your behalf relating to securities held in accounts managed by Siebert, its Independent Managers and its Sub-Advisers, including, but not limited to: Palladium, LLC or Brinker Capital in any legal proceeding (including, without limitation, class actions, class action settlements and bankruptcies).

Siebert may not file proofs of claim relating to securities held in your account and does not notify you or your custodian of class action settlements or bankruptcies relating in any way to such account. You should consult with your custodian and other service providers to ensure such coverage.

## ***ITEM 16 - INVESTMENT DISCRETION***

Upon receiving written authorization from the client, Siebert may provide discretionary investment advisory services for client portfolios. When discretionary authority is granted, Siebert will have the authority to:

- determine the timing, type and amount of securities that can be purchased or sold for the client portfolio;
- select the broker or dealer to be used for the purchase and sale of securities in client's portfolio; and,
- to determine commission rates paid without obtaining the client's consent for each transaction.

Siebert may be given the authority to exercise discretion on behalf of clients. Siebert is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. Siebert is given this authority through a power-of-attorney included in the agreement between Siebert and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold).

Certain purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Siebert and its Chief Investment Officer. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement in writing containing applicable limitations, if any, to such authority. Discretionary trades made by Siebert will be in accordance with each Client's investment objectives and goals. If Client's Investment objectives change, the Client must provide such changes in writing to the Advisor.

## ***ITEM 17 - VOTING CLIENT SECURITIES***

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

OTHERWISE: If you, as a client of Siebert, elect to have an Independent Manager of a selected Managed Program vote proxies for you, your custodian will send reorganization notices and proxy materials to the portfolio manager. If your account is a tax-qualified retirement plan subject to ERISA, unless you opt to do it yourself, your portfolio manager will vote your proxies. If your account is not an ERISA account, you may either retain the right to vote proxies or delegate such authority to your portfolio manager.

The portfolio managers for each Managed Program have their own proxy voting policies and the policies may differ for each Managed Program. Clients should review the Form ADV Part 2A of the portfolio managers for their selected Managed Program for specifics regarding the managers' proxy voting policies. Clients can contact their Siebert financial adviser at 855.299.1980 if they have any questions about specific proxy votes.

## ***ITEM 18 - FINANCIAL INFORMATION***

As an advisory firm we are required in this item to provide clients with certain financial information or disclosures about the firm's financial condition. Siebert does not require or solicit the prepayment of more than \$500 in fees six months or more in advance. In addition, Siebert is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Siebert has no disclosures pursuant to this Item. As such, Siebert is not required to deliver a balance sheet along with this Brochure.