

*This brochure supplement provides information about Kenneth John Ruskin that supplements the Acclivity Capital Management LLC brochure. You should have received a copy of that brochure. Please contact Kenneth John Ruskin if you did not receive Acclivity Capital Management LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Kenneth John Ruskin is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

# **Acclivity Capital Management LLC**

## **Form ADV Part 2B – Individual Disclosure Brochure**

*for*

**Kenneth John Ruskin**

Personal CRD Number: 3070226

Investment Adviser Representative

Acclivity Capital Management LLC  
28 W. 44th St. 16th floor  
NY, NY 10036  
(212) 521-5199  
[kruskin@acclivitycap.com](mailto:kruskin@acclivitycap.com)

UPDATED: 10/23/2015

## **Item 2: Educational Background and Business Experience**

**Name:** Kenneth John Ruskin      **Born:** 1970

### **Educational Background and Professional Designations:**

#### **Education:**

A.B. Economics, Princeton University - 1992

M.B.A., The Wharton School of the University of Pennsylvania - 1999

#### **Designations:**

##### **CFA - Chartered Financial Analyst**

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

##### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

##### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly

evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **Business Background:**

03/2013 - Present	Director of Research Acclivity Capital Management LLC
04/2003 - 02/2013	Portfolio Manager Temujin Fund Management

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Kenneth John Ruskin is not engaged in any investment-related business or occupation (other than this advisory firm).

### **Item 5: Additional Compensation**

Kenneth John Ruskin does not receive any economic benefit from any person, company, or organization, other than Acclivity Capital Management LLC in exchange for providing clients advisory services through Acclivity Capital Management LLC.

### **Item 6: Supervision**

As a representative of Acclivity Capital Management LLC, Kenneth John Ruskin works closely with supervisor Bradley H. Gendell, and all advice provided to clients is reviewed by this supervisor prior to implementation. Bradley Gendell can be reached at (212) 521-5198. Kenneth John Ruskin adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements For State Registered Advisers

*This disclosure is required by New York state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

A. Kenneth John Ruskin has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - a) an investment or an investment-related business or activity;
  - b) fraud, false statement(s), or omissions;
  - c) theft, embezzlement, or other wrongful taking of property;
  - d) bribery, forgery, counterfeiting, or extortion; or
  - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) an investment or an investment-related business or activity;
  - b) fraud, false statement(s), or omissions;
  - c) theft, embezzlement, or other wrongful taking of property;
  - d) bribery, forgery, counterfeiting, or extortion; or
  - e) dishonest, unfair, or unethical practices.

B. Kenneth John Ruskin has NOT been the subject of a bankruptcy petition in the past ten years.