

INFORMATION BROCHURE  
ADVISORS ACT RULE 204-3  
ON

DIAMANT ASSET MANAGEMENT, INC.

170 MASON STREET  
GREENWICH, CONNECTICUT 06830

www.portfolioadvisor.com  
203-661-6410

Dated 12/30/2016

PART II OF FORM ADV  
INVESTMENT ADVISOR REGISTRATION  
ON FILE WITH THE  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON D.C.

AS PER ADVISORS ACT RULE 204-3

Item 1 – Cover Page

This Brochure provides information about the qualifications and business practices of Diamant Asset Management, Inc. If you have any questions about the contents of this Brochure, please contact us at 203-661-6410. 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.

Diamant Asset Management, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Diamant Asset Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated 12/30/16 is a similar document to our previous brochure dated 03/4/16, which was prepared according to the SEC’s requirements and rules.

This section discusses only specific material changes that are made to the Brochure and provides clients with a summary of such changes. The Firm brought on a new investment manager as described in Item 4 and the Brochure Supplement. While there were some other small changes to the text, no other material changes are being reported in this Firm Brochure. The date of our last annual update of this brochure was 03/4/16.

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 new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Herbert Diamant at 203-661-6410. Additional information about Diamant Asset Management, Inc. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Diamant Asset Management, Inc. who are registered, or are required to be registered, as investment adviser representatives of Diamant Asset Management, Inc.

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#### Item 4 – Advisory Business

Diamant Asset Management, Inc. (“Firm”) provides investment supervisory services on a discretionary and non-discretionary basis for a broad base of clients, including individuals, families, trusts, and retirement plans. Services may include defining investment objectives, asset allocation among types of securities, and portfolio management of equity and income oriented accounts.

In providing its services, the sole standard of care imposed upon the Firm shall be to act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of a like character with like aims. In addition, the Firm assumes no responsibility for the accuracy of information furnished to the Firm by a client or a client's agent. With respect to investing in mutual funds, the client in effect will be paying two management fees, one to the Firm and one to the mutual fund advisor.

The Firm was granted registration on December 10, 1986 as an investment advisor pursuant to Section 203 of the Investment Advisers Act of 1940. Herbert Diamant is the principal shareholder of the Firm. Mr. Diamant has been engaged in the business of providing investment services to investment clientele since 1978. Prior investment services were and continue to be rendered through Diamant Investment Corporation, an affiliated broker-dealer.

For more than thirty eight years, the Diamant family continues to be actively involved in the investment business as the sole owners of both Diamant Asset Management, Inc. and Diamant Investment Corporation. The Diamant's remain committed to providing senior level, long term investment advice and personal client attention. We avoid continuous turnover of key personnel to enable continuity of our relationships.

A client's account is handled by a senior portfolio manager who is an experienced professional. Although we require a minimum of 7 years of investment experience before becoming a portfolio manager, Herbert Diamant has 38 years of experience, Kevin Jakeway has over 20 years of experience, and the newest manager, Lyn McCabe, has over 9 years of experience. The combined investment experience and seasoning of our portfolio managers has occurred through many economic and market conditions. To provide its hallmark of high quality, hands on service to its clients, the Firm restricts portfolio management to a limited number of sizable accounts. As of December 31, 2015, assets under management were \$150,931,802, with \$88,847,729 representing assets held in discretionary accounts, and \$62,084,073 representing assets held in non-discretionary accounts.

#### Item 5 – Fees and Compensation

The specific manner in which fees are charged by the Firm is established in a client's written agreement with the Firm. The Firm will bill its fees on a quarterly basis in arrears. Advisory fees will not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. The amount of the portfolio management fee is negotiable. Accounts initiated or terminated

during a quarterly period will be charged a prorated fee. Upon termination of any account, any earned, unpaid fees will be due and payable. Advisory fees will be determined as of the close of business on the date at the end of each calendar quarter, and will be charged within a two week period following the end of the quarter. Management of the account will commence upon receipt of assets into the account. Clients authorize the Firm to directly debit fees from client accounts.

The annual fee schedule is based on a percentage of the market value and type of assets placed under management. Fees are calculated by separating the equity and fixed income bond segments of the overall portfolio. The Equities fee schedule is applied to the equities segment of the overall portfolio, and the Fixed Income Bonds fee schedule is applied to the fixed income bond segment of the overall portfolio. Cash equivalents are categorized as part of the fixed income bond portfolio.

The total advisory fee charged is the combination of the two segments. The total advisory fee as a percentage of assets will be lower with the inclusion of a fixed income bond segment versus all assets being held in the equity segment.

Equities fee schedule:

<u>Market Value of Portfolio</u>	<u>Annual Fee Rate</u>
\$ 0 to \$1,000,000	1.50%
\$1,000,001 to \$2,500,000	1.25%
\$2,500,001 to \$5,000,000	1.00%
More than \$5,000,000	0.75%

Fixed Income Bonds fee schedule:

<u>Market Value of Portfolio</u>	<u>Annual Fee Rate</u>
\$ 0 to \$1,000,000	0.75%
\$1,000,001 to \$10,000,000	0.50%
More than \$10,000,000	0.375%

Minimum quarterly fee of \$2,000.00

The Firm is engaging in a project to make all of the fees uniform, however, some long term clients have traditionally paid different fees. The firm has modified its fees with the goal of making them uniform for each client. While all fees are negotiable, the firm hopes to adhere to the above fee schedule.

The Firm's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer charges, wire transfer and

electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to the Firm's fee, and the Firm shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that the Firm considers in selecting or recommending a broker-dealer for client transactions and determining the reasonableness of their compensation.

## Item 6 – Performance Based Fees and Side-By-Side Management

Performance based fee arrangements (fees based on a share of capital gains on or capital appreciation of the assets of a client) may create an incentive for an advisor to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. As we believe this process is contrary to providing conservative investment guidance, the Firm does not charge any performance-based fees.

Side-By-Side Management typically permits an institutional manager to run a hedge fund along side an investment fund in order to provide higher compensation to the manager. The Firm does not engage in this type of business, preferring to focus its efforts serving the needs of individual investors.

## Item 7 – Types of Clients

The Firm provides portfolio management services to individuals, high net worth individuals, individual retirement plans, corporate pension and profit-sharing plans, trusts, estates, and foundations.

We typically provide investment advice and management to high net worth individuals and families. Therefore, our focus is on the investment issues relating to individual accounts.

## Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

The Firm's method of security analysis is mainly fundamental in nature, reviewing information such as sales, profits, strength of balance sheet, product mix, and management. The Firm may also use technical charting to confirm decisions.

Our own research and judgment is used to select specific securities for portfolios. The main sources of information include annual reports, filings with the Securities and Exchange Commission, research material prepared by others, financial newspapers and magazines, and corporate rating services. The Firm uses Argus Research for macroeconomic research, company specific research, and for

discussions and consultations with their analysts regarding specific stock and industry sector ideas. The Firm also relies on information provided from Bloomberg Professional services and data products.

The Firm's investment strategy is to tailor each investment portfolio to meet the specific needs of the client. The Firm evaluates and designs a portfolio that meets specific objectives. Based on these goals, appropriate securities are selected. Tax impacts are always considered, whether building portfolios or selling holdings. Most importantly, we constantly oversee the portfolio to meet long term investment goals. We buy and hold securities for the long term, and believe very strongly in the preservation of capital through our conservative investing in quality securities.

Our preference is to discuss major investment decisions with our clients. Discussions or correspondence are used to keep clients apprised on how their investments are meeting their objectives. Communication is especially important when designing investment plans and objectives, or with substantial shifts in portfolio strategy.

The investment time horizon of the Firm is long term in nature. The investment experience of the Firm leads to an investment strategy of a buy and hold approach, selecting quality equity securities that will grow over time, along with secure income securities. The Firm's primary strategy does not involve frequent trading of securities, margin, or the use of option strategies in an attempt to amplify returns.

To position portfolios for a long term capital appreciation, the Firm buys and sells equity securities primarily traded on a national exchange such as the New York Stock Exchange and the NASDAQ. Our portfolios typically include high quality, domestic, blue chip type stocks, but may include international stocks. Depending on the client's investment objectives, some portfolios may include more aggressive investments in mid-cap and/or small cap stocks. Portfolios may include investments in ETF's (exchange traded funds) to gain access to a particular market or industry sector.

To meet income needs, portfolios of high net worth individual investors may include quality municipal bonds. Portfolios of tax exempt entities (such as retirement accounts) and low tax bracket individuals, may include secure corporate bonds to satisfy income needs. The Firm avoids investing in below investment grade municipal bonds or corporate bonds, as the Firm focuses on the goal of capital preservation and stable income over the objective of maximizing return. Publicly traded limited partnerships and real estate investment trusts may also be used as income vehicles.

Our client investment portfolios are allocated by selected asset classes, which may include equities, bonds, and cash equivalents. Stock portfolios are further diversified between industry groups and stock selections. Bond holdings are diversified into multiple securities to avoid concentration with one municipality. We believe this investment strategy and style typically does not involve significant or unusual risks. Our experience is that our buy and hold philosophy, combined with a long term time horizon, mitigates material risks. Nonetheless, investing in securities involves risk of loss that clients should be prepared to bear.

## Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Firm or the integrity of the Firm's management. At all times which are material to this disclosure, neither the Firm or its personnel has been disciplined.

## Item 10 – Other Financial Industry Activities and Affiliations

The firm has arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer. The principal executive officer spends approximately 40% of his business time providing services to the broker-dealer affiliate Diamant Investment Corporation, by effecting transactions in securities and maintaining regulatory compliance. The Firm's principal executive officer receives additional salaried compensation as general principal and registered representative of the affiliate, but does not receive any compensation based on transactions in securities.

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

The Firm's corporate Code of Ethics (Code) establishes standards of conduct that are expected of supervised persons and reflect the Firm's fiduciary duties to its clientele. This Code reflects the Firm's commitment to high ethical practices and the sharing of responsibility for maintaining those practices among employees. Fundamental to the personnel policies and practices that implement the Code is the Firm's insistence that business be conducted in an environment of mutual respect. Many of these policies are based upon laws and regulations, others upon widely held philosophical and ethical principles. Violation of these policies may result in discipline, including termination.

The Firm has the responsibility to render professional, continuous, and unbiased investment advice. As a fiduciary, the Firm owes its clients a duty of honesty, good faith, and fair dealing. Further, the Firm must act at all times in the client's best interests, and must either avoid or disclose conflicts of interest. All employees personal securities transactions shall be conducted in such a manner as to be consistent with the Code, to avoid any actual or potential conflict of interest, or any abuse of an employee's position of trust and responsibility. As a hallmark of the Firm's business is confidentiality, information concerning the identity of security holdings and financial circumstances of clients is and must remain confidential.

Each employee shares the responsibility to comply not only with the plain language of these policies and applicable laws, but to embrace the spirit and purposes of these policies in their business and interpersonal conduct. The Firm's reputation is built on principles of honesty, integrity, and professionalism, and its ability to prosper in the future is dependent on all employees embracing these principles. All supervised persons at the Firm must acknowledge the terms of the Code of Ethics



annually, or as amended. The Firm will provide a copy of its Code of Ethics to any client, or prospective client, upon written request.

The Firm does not recommend, buy, or sell securities in which the advisor has a material financial interest.

Advisory personnel (which includes company officers, employees, directors, stockholders, or members of their families) may at times have a position in the same securities that clients own, and may make purchases or sales of these securities from time to time in the open market. Personal trading by Advisory personnel are to be conducted in an ethical manner that complies with industry regulations. The fact that such persons acquire, or not acquire securities themselves or for any other client is not to be considered in determining the advisability of acquiring or not acquiring similar securities for the portfolio account of any client.

All personal securities transactions by Employees must avoid a conflict with the interests of a client. Personal securities trading that may conflict with the interests of any client is strictly prohibited. Clients of the Firm have priority on purchases and sales before placing orders for advisory personnel. Advisory personnel must follow the Firm's Client Priority Rule detailed in its written supervisory procedures when conducting personal securities trading. When entering the same side trades from a customer and advisory personnel, the customer trade shall be entered ahead of the advisory personnel trade, except where the market is liquid enough where entering simultaneous trades would not impact market depth or ability to execute the customer trade. All advisory personnel are subject to specific procedures, including pre-clearance of transactions and detailed trade reporting and compliance review.

## Item 12 – Brokerage Practices

The Firm suggests transactions be placed with affiliate Diamant Investment Corporation, which is located in the same office, so as to take advantage of client services, and rapid executions available with this broker-dealer. Clients are not required to designate the Firm's affiliate. Substantially all of the Firm's clients have authorized the Firm to use the affiliated broker-dealer to hold securities and handle security transactions. The Firm's overall investment philosophy generally results in a low portfolio turnover rate, excepting a possible reallocation of existing securities into new securities to meet a clients changing needs. Over the years of a client relationship, with low transaction volume, commission dollars per account are not substantial in nature in relation to the size of the overall account.

The use of commission dollars includes rapid access to the marketplace, access to live market information, handling customer disbursement needs, year end tax reporting, accessing research, and the providing of current account information both to the investment advisor and to the portfolio accounting system. By using client brokerage commission dollars to obtain these important operational efficiencies, the Firm receives a benefit in that it can focus on portfolio management. While the Client may designate any broker-dealer of its choosing, the use of a broker-dealer other than this affiliate would severely limit the advisory services provided by the Firm.

The commission charges paid by Clients to affiliate Diamant Investment Corporation are calculated as a fixed rate of \$95 per transaction. Some long term clients have been paying a commission rate of 1% of the principal amount. The Firm has undertaken a program to change the commission rates for all clients to the flat fee of \$95 per transaction to make commissions uniform for all clients. Any commission charged by this affiliate on a transaction may be more or less than the commissions charged to or by others in similar transactions. Inherent to the bond business, this affiliated broker-dealer may be compensated for their expertise in locating bonds in the form of markups or markdowns to the market. Such bond compensation may be smaller than or in excess of compensation for equity commissions.

Not all advisers require their clients to direct brokerage. By directing brokerage the Firm may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money. However, all trades are reviewed at time of execution against the prevailing market to minimize this occurrence and insure a favorable execution occurs.

Each portfolio is individually managed. Decisions to buy and sell are made for each account separately. This process does not create conditions for aggregating the purchase or sale of securities for various client accounts. If the opportunity arises when customers are buying or selling the same security, and market conditions are such that in our judgment the aggregating of the order does not harm the best execution of the transaction, the shares may be aggregated. As the transaction cost is a small amount of the transaction, the decision to aggregate, or not aggregate orders, does not materially impact the trade cost to the client.

### Item 13 – Review of Accounts

Reviews of an investment advisory account are triggered by the calendar year. A full review occurs every six months. Minor reviews are performed when changes in price or income occur on securities.

There is one reviewer of the portfolio. This person is either a principal or an investment advisory agent of the company. The reviewer may rely on assistance from the Firm's portfolio managers in an account review. The President performs reviews of all accounts. It is the Firm's intent to seek approximately one hundred accounts. The reviewer is instructed to monitor investment performance in relation to each client's goals and objectives. If, as a result of a review performed when changes of price or income occurred, the reviewer concludes that a change in investment is warranted, on non-discretionary accounts, the Firm has instructed the reviewer to contact the client, make an appropriate recommendation and abide by the client's investment decision. On accounts where the Firm has discretionary authority, the reviewer may take the action needed to implement the change in investment.

The nature and frequency of regular reports to clients on their accounts is a written semi-annual portfolio analysis and review. In addition, market valuations are provided on a quarterly basis. These market valuation reports are sent along with Diamant Investment Corporation Customer Statements, which detail the account activity and the custody and safekeeping of positions for the period. For information on custody, see Item 15.

## Item 14 – Client Referrals and Other Compensation

We encourage referrals of potential clients from our existing client base, based on the presumption the Firm may be able to provide needed assistance with their financial affairs. No economic benefit or compensation is paid directly or indirectly to any person, for any referral of business.

## Item 15 - Custody

Diamant Investment Corporation is a self-clearing broker-dealer that maintains custody of customer investment assets in a manner consistent with the Securities and Exchange Act of 1934. Regarding custody, it complies with possession and control testing with SEC Rules 17a-13 (periodic count and verification of securities positions) and SEC 15c3-3 (possession and control of customer securities). Outstanding recordkeeping is evident in that Diamant Investment Corporation has maintained accurate and reconciled security counts for every share of securities, for every one of its customers, since its inception in 1974. The Firm's management believes there are but a few firms in the entire securities industry that are able match this track record.

Diamant Asset Management, Inc. does not actually hold any securities. It is engaged in the investment advisory business and maintains regulatory compliance pursuant to the Investment Advisors Act of 1940. Because of the affiliation with Diamant Investment Corporation, however, Diamant Asset Management, Inc. is deemed to have custody of advisory client assets. With this custody relationship, both affiliated firms conduct a higher level of auditing of controls and procedures, external surprise audits, and routine internal monthly audits to insure accuracy of information regarding customer assets.

Clients receive quarterly statements from Diamant Investment Corporation, the affiliated broker-dealer that holds and maintains client's investment assets. The Firm urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide to customers. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. To insure accuracy of customer reports, the Firm reconciles and confirms each position held at the affiliated broker-dealer to insure accuracy of customer reports on at least a monthly basis.

## Item 16 – Investment Discretion

The Firm usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. Investment discretion is part of the investment advisory contract signed by the client. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

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When selecting securities and determining amounts, The Firm observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to the Firm in writing.

### Item 17 – Voting Client Securities

It is the policy of the Firm that when it exercises voting authority over client proxies, the proxies are voted in the best interests of the clients. We shall exercise the duties of care and loyalty when voting proxies. The duty of care requires us to monitor corporate events and to vote the proxies. This duty of care does not mean that failure to vote on every proxy would necessarily violate our fiduciary obligations. To satisfy its duty of loyalty, the Firm must cast the proxy votes in a manner consistent with the best interest of its client and must not subrogate client interests to the Firm's own interest. Upon receipt of a written request directly from a client, we shall provide records of proxy voting information with respect to the particular client's holdings. On receipt of a written request from a client, we shall provide a copy of our voting policies and procedures.

### Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Firm's financial condition. The Firm 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.

Item 1 – Cover Page

Herbert Diamant

DIAMANT ASSET MANAGEMENT, INC.

170 Mason Street  
Greenwich, Connecticut 06830  
203-661-6410

Brochure Supplement

Dated 12/30/2016

This Brochure Supplement provides information about Herbert Diamant that supplements the Diamant Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Herbert Diamant if you did not receive Diamant Asset Management, Inc.'s Brochure or if you have any questions about the contents of this supplement. Additional information about Herbert Diamant is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Item 2 – Educational Background and Business Experience

Herbert Diamant: Born 1957. Graduated from Georgetown University BSBA with Finance and Marketing dual majors, and an Economics minor. Business background : Officer, and Senior Portfolio Manager of the registered investment advisory firm of Diamant Asset Management, Inc. Officer and Principal of general securities broker/dealer firm of Diamant Investment Corporation.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. At all times which are material to this disclosure, Mr. Diamant has not been disciplined.

Item 4 – Other Business Activities

Herbert Diamant is actively engaged in the investment related business of both Diamant Asset Management, Inc. and Diamant Investment Corporation. At the broker/dealer firm of Diamant Investment Corporation, he is registered as a General Securities Principal, a Financial and Operations Principal, a Limited Representative Equity Trader, a Municipal Securities Principal, and a General Securities Registered Representative.

There is a business relationship between Diamant Asset Management, Inc. and the affiliated firm of Diamant Investment Corporation. Diamant Investment Corporation provides necessary investment services of custody and safekeeping, trade execution, and other brokerage services to the clients of Diamant Asset Management, Inc.

Herbert Diamant, the principal executive officer, spends approximately 40% of his business time providing services to affiliate Diamant Investment Corporation. Mr. Diamant receives additional salaried compensation for his registered capacities described above, but does not receive any compensation based on transactions in securities. There is no incentive for Herbert Diamant to recommend investment products based on the compensation received, rather than the client's needs.

#### Item 5 – Additional Compensation

There are no arrangements for additional compensation or economic benefit to Herbert Diamant from any person who is not a client.

#### Item 6 – Supervision

Diamant Asset Management Inc. and its employees follow both a written Code of Ethics and written General Office Supervisory Procedures. These manuals provide procedures and methods to insure the firm maintains compliance with laws, regulations, and the proper practices of an investment advisor. The Firm has purposely limited the amount of employees and has maintained itself as a small company. Given its small size, one or two individuals must provide appropriate supervision, inspection, and other responsibilities which at larger firms may be provided by larger staffs. Despite its limited personnel, the Firm follows procedures to operate a regulatory compliant business.

Herbert Diamant has the experience to hold several positions at Diamant Asset Management Inc. His roles include Senior Portfolio Manager and Chief Compliance officer. The Chief Compliance Officer is responsible for monitoring the advice the supervised person provides to clients. In this case, Herbert Diamant acts as Chief Compliance Officer and monitors the advice of Herbert Diamant. Mr. Diamant can be reached at 203-661-6410.

The sole shareholder and owner of Diamant Asset Management Inc. is Herbert Diamant. As such, he has a vested interest in insuring the advice rendered is in line with stated procedures. To continue the long term client relationships he enjoys, his focus is therefore aligned with customers to make sure client investment needs continue to be met over time.

Item 1 – Cover Page

Kevin W. Jakeway

DIAMANT ASSET MANAGEMENT, INC.

170 Mason Street  
Greenwich, Connecticut 06830  
203-661-6410

Brochure Supplement

Dated 12/30/2016

This Brochure Supplement provides information about Kevin W. Jakeway that supplements the Diamant Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Herbert Diamant if you did not receive Diamant Asset Management, Inc.'s Brochure or if you have any questions about the contents of this supplement. Additional information about Kevin W. Jakeway is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Item 2 – Educational Background and Business Experience

Kevin W. Jakeway: Born 1955. Graduated Columbia University MBA with an Accounting major. Graduated magna cum laude from Georgetown University BSBA with a Finance major. Business background: Portfolio Manager of the registered investment advisory firm of Diamant Asset Management, Inc.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. At all times which are material to this disclosure Mr. Jakeway has not been disciplined.

Item 4 – Other Business Activities

Kevin W. Jakeway is solely engaged in the investment related business of Diamant Asset Management, Inc. There are no other business activities to report.

Item 5 – Additional Compensation

There are no arrangements for additional compensation or economic benefit to Kevin W. Jakeway from any person who is not a client.

Item 6 – Supervision

Diamant Asset Management Inc. and its employees follow both a written Code of Ethics and written General Office Supervisory Procedures. These manuals provide procedures and methods to insure the firms maintains compliance with laws, regulations, and the proper practices of an investment advisor.



The Firm has purposely limited the amount of employees and has maintained itself as a small company. Given its small size, one or two individuals must provide appropriate supervision, inspection, and other responsibilities which at larger firms may be provided by larger staffs. Despite its limited personnel, the Firm follows procedures to operate a regulatory business which is compliant.

Kevin W. Jakeway has sufficient experience in investment management to be a Portfolio Manager to clients. The Chief Compliance Officer is responsible for monitoring the advice the supervised person provides to clients. In this case, Herbert Diamant acts as Chief Compliance Officer and monitors the advice of Kevin W. Jakeway. Mr. Diamant can be reached at 203-661-6410.

## Item 1 – Cover Page

Lyn McCabe

DIAMANT ASSET MANAGEMENT, INC.

170 Mason Street  
Greenwich, Connecticut 06830  
203-661-6410

Brochure Supplement

Dated 12/30/2016

This Brochure Supplement provides information about Lyn McCabe that supplements the Diamant Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Herbert Diamant if you did not receive Diamant Asset Management, Inc.'s Brochure or if you have any questions about the contents of this supplement. Additional information about Lyn McCabe is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Lyn McCabe: Born 1977. Graduated Fordham University with a Bachelor of Arts. Business background: Portfolio Manager of the registered investment advisory firm of Diamant Asset Management, Inc.. Portfolio administrator for Wright Investors' Service, an institutional investment advisor, for two years. Equity trader at Newgate Capital Management, another institutional investment advisor, for six years.

## Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. At all times which are material to this disclosure Ms. McCabe has not been disciplined.

## Item 4 – Other Business Activities

Lyn McCabe is actively engaged in the investment related business of Diamant Asset Management, Inc. She also is licensed as a General Securities Representative license with affiliate Diamant Investment Corporation. Ms. McCabe spends approximately 30% of her business time providing services to this affiliate, receives additional salaried compensation for her registered capacities described above, but does not receive any compensation based on transactions in securities.

## Item 5 – Additional Compensation

There are no arrangements for additional compensation or economic benefit to Lyn McCabe from any person who is not a client.

Item 6 – Supervision

Diamant Asset Management Inc. and its employees follow both a written Code of Ethics and written General Office Supervisory Procedures. These manuals provide procedures and methods to insure the firm maintains compliance with laws, regulations, and the proper practices of an investment advisor. The Firm has purposely limited the amount of employees and has maintained itself as a small company. Given its small size, one or two individuals must provide appropriate supervision, inspection, and other responsibilities which at larger firms may be provided by larger staffs. Despite its limited personnel, the Firm follows procedures to operate a regulatory business which is compliant.

Lyn McCabe has sufficient experience in investment management to be a Portfolio Manager to clients. The Chief Compliance Officer is responsible for monitoring the advice the supervised person provides to clients. In this case, Herbert Diamant acts as Chief Compliance Officer and monitors the advice of Lyn McCabe. Mr. Diamant can be reached at 203-661-6410.