



**AMERICAN MONEY
MANAGEMENT, LLC**

SEC Registered Investment Advisor

14249 Rancho Santa Fe Farms Road
Rancho Santa Fe, CA 92067

(888) 999-1395

www.amminvest.com

September 29, 2017

This Brochure provides information about the qualifications and business practices of American Money Management, LLC (“AMM”). If you have any questions about the contents of this Brochure, please contact us at (888) 999-1395 or info@amminvest.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

American Money Management, LLC is an SEC 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 American Money Management, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This brochure, dated September 29, 2017, includes some material changes from AMM’s last brochure, dated March 17, 2017.

The material changes include:

1. Item 5 Fees & Compensation:

- a. We moved language related to Monterey Receivables Funding (MRF) Compensation to Item 5 from Item 10 (Other Financial Industry Affiliations). There has been no change to the language related to the notes but the disclosure is more appropriate under Item 5.
- b. Language was added to Item 5 to reflect fees paid to AMM for recommending first trust deeds to clients. Full text below:

“AMM may periodically recommend clients invest in first trust deeds offered by third parties. See Item 8 for more information on first trust deeds. AMM’s compensation related to first trust deeds has been in the form of a “referral fee” paid by the issuer. The client is required by AMM to sign a form that discloses this fee and the conflict of interest before the first trust deed investment is made.”

- c. We expanded the language related to fees and expenses on mutual funds to include the following:

“When investing in mutual funds AMM seeks to buy the lowest cost share class available. However, in many circumstances AMM may opt for a higher cost share class if that class is available to be traded free of any commissions or transaction costs at the broker dealer holding custody of the account. Since AMM periodically rebalances portfolios, we believe the flexibility of trading in no transaction fee funds may offer advantages over recommending a fund that is subject to transaction fees. Depending on how frequently we buy or sell a fund, the overall cost to the client may actually be lower utilizing the higher expense no transaction fee fund vs. the lower expense transaction fee fund. However, due to the uncertain timing of when a fund rebalance trade may occur (triggering factors include price change of underlying investments in the account, general market volatility, client deposits or withdrawals, and strategy adjustments by the portfolio manager) there is no guarantee that a client will pay lower fees by investing in the no transaction fee funds.”

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

We expanded this section to include a discussion of AMM's periodic recommendation of Alternative Investments, including collateralized notes and first trust deeds. Full text below:

"Alternative Investments"

AMM may periodically recommend alternative investments to clients as part of their overall asset allocation strategy. These investments may include collateralized notes, first trust deeds, and other private placement offerings. These investments are typically only available to accredited investors and AMM associates will seek to determine a client's accredited status before making any recommendation related to these offerings. Below we outline the two most common Alternative Investments recommended by AMM.

Collateralized Notes:

AMM may periodically recommend 1 year collateralized notes issued by Monterey Receivables Funding (MRF) as part of the clients overall asset allocation. The notes are income producing instruments and are typically used as part of a client's overall fixed income allocation.

These notes are private offerings and are only available to accredited investors. The minimum investment in the notes is \$50,000; however the supply of notes is limited. The issuer of the notes commonly closes to new investors (often for many months) so AMM maintains a wait list of clients for whom it feels are suitable candidates for investment. This is generally based on a client's accreditation status; along with their stated desire for income and/or a client with an asset allocation strategy that includes a sizeable weighting in fixed income instruments. While AMM will do its best to determine those clients for which the notes are suitable, there is no guarantee that all clients that want notes will be able to invest in them.

Collateralized notes have their own set of risks which are outlined in the private placement memorandum (PPM). Accredited clients interested in the notes may request a copy of the PPM by calling American Money Management at 858-755-0909.

First Trust Deeds:

AMM may periodically recommend select first trust deed investments to clients. First trust deeds are real estate loans backed by real property. These investments are income producing instruments and are typically recommended to clients seeking income. AMM has historically sourced these investments through a single developer located in Solana

Beach, CA; though we may source additional first trust deeds through other developers and real estate investors in the future. AMM is generally very selective in its recommendation of first trust deeds and many years may go by without any first trust deeds being recommended to clients. Due to this selectivity and limited supply, there is no guarantee that all clients interested and/or suitable for these investments will be able to invest in them.

While first trust deeds are backed by real property, there is no guarantee that this collateral will make the investor whole in the event of a default by the borrower.”

3. **Item 15 Custody:**

We have expanded the language in Item 15 to include additional information on the firm’s limited custody as it relates to money movement authorizations. Full text below:

“Additionally, authorized AMM associates may be granted permission from the client to periodically process money movement transactions, including checks, wires and electronic transfers, on their behalf. AMM is generally granted authorization to process first party (like registration) check and journal requests at the time the account at the custodian is opened. For first party wires and all third party money movement requests, the client must explicitly grant AMM the authority (either one time or via standing instructions) in writing. This ability to deduct AMM’s advisory fees and periodically process money movement transactions from client accounts causes AMM to exercise *limited* custody over client funds and/or securities. *However, this ability to debit fees and process money movement transactions does not constitute physical custody of any client funds and/or securities.*”

Item 3 -Table of Contents

Item 2 – Material Changes.....	ii
Item 3 -- Table of Contents	v
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation	2
Item 6 – Performance-Based Fees and Side-By-Side Management	4
Item 7 – Types of Clients.....	4
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	4
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics	9
Item 12 – Brokerage Practices	10
Item 13 – Review of Accounts.....	12
Item 14 – <i>Client</i> Referrals and Other Compensation.....	12
Item 15 – Custody	13
Item 16 – Investment Discretion	13
Item 17 – Voting <i>Client</i> Securities.....	14
Item 18 – Financial Information.....	14
Brochure Supplement(s)	

Item 4 – Advisory Business

American Money Management, LLC (“AMM”), established in 1999, is an SEC registered Investment Adviser based in Rancho Santa Fe, California. The principal owners are Gabriel B. Wisdom (a founder, 50% owner, and Managing Director of AMM) and Michael Moore (50% owner, Managing Director and Chief Investment Officer of AMM).

Investment Supervisory Services

AMM’s primary business is providing investment supervisory services. In particular, AMM manages client funds and securities for a fee based on a percentage of the fluctuating value of the assets managed. AMM provides these services to individuals, investment companies, pension and profit sharing plans, trusts, corporations and other business entities. Investment supervisory services include, but are not limited to, the following: Investment Strategy, Asset Allocation, Asset Selection and Regular Portfolio Monitoring.

AMM tailors its investment advice to the individual needs of its clients by evaluating their current investments with respect to their risk tolerance levels and investment time horizon. At the outset of a new client relationship, AMM collects this information from the client in the form of a Client Profile & Questionnaire and/or client interview. This information allows us to select a portfolio strategy that matches each client’s specific situation.

Mutual Fund Management

AMM serves as manager of a publicly traded mutual fund, the Fallen Angels Income Fund, a series of MSS Funds, an Ohio Business Trust. Clients of AMM who are also invested in the Fallen Angels Income Fund, and any other funds that AMM may manage in the future, will not be charged an advisory fee by AMM on that portion of assets invested in the funds.

Newsletter

Gabriel B. Wisdom and Michael Moore along with portfolio manager Glenn Busch publish a free monthly e-newsletter entitled “The AMM Dividend Letter”. The newsletter is distributed via email to clients invested in the firm’s Dividend Strategy. Additionally, non-clients can sign up for the newsletter through Mr. Wisdom’s website (www.gabrielwisdom.com) as well as on a website created specifically for this report, (www.ammdividendletter.com). In each bulletin, the editors discuss one or more dividend paying stocks. Stocks discussed are generally, but not always, positions held by clients of AMM. As stated in each newsletter:

“The opinions expressed in “The AMM Dividend Letter” are those of Gabriel Wisdom, Michael Moore and Glenn Busch and do not necessarily reflect the opinions of American Money Management, LLC (AMM), an SEC Registered Investment Advisor who serves as a portfolio manager to private accounts as well

as to mutual funds. Clients of AMM, Mr. Wisdom, Mr. Moore, Mr. Busch, employees of AMM, and mutual funds AMM manages may buy or sell investments mentioned without prior notice. This newsletter should not be considered investment advice and is for educational purposes only. The opinions expressed do not constitute a recommendation to buy or sell securities. Investing involves risks, and you should consult your own investment advisor, attorney, or accountant before investing in anything.”

401-K Advisory Services

In addition to ongoing discretionary portfolio management services, we provide non-discretionary advisory services to 401-K plans. These services include monitoring investment choices on the 401-K platform, recommending changes to investment choices on the 401-K platform, conducting periodic meetings at client's location, and assisting with new plan enrollments, among other services. While providing general asset allocation guidance, we do not have the authority to buy or sell securities within the clients 401-K account. All investment and allocation decisions are ultimately the clients own.

As of March 14, 2017, AMM manages \$233,292,155 on a discretionary basis, and \$5,361,101 on a non-discretionary basis.

Item 5 – Fees and Compensation

The annual fee ranges from 0.25% to 3.00% and may be negotiable depending on the size and complexity of the client's account. Lower fees for comparable services may be available from other sources.

The specific manner in which fees are charged by AMM is established in a client's written agreement with AMM. AMM collects its fees at the start of each quarter, in advance. AMM directly debits its fees from client accounts. Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

AMM'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 taxes, 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.

When investing in mutual funds AMM seeks to buy the lowest cost share class available. However, in many circumstances AMM may opt for a higher cost share class if that class is available to be traded free of any commissions or transaction costs at the broker dealer holding custody of the account. Since AMM periodically rebalances portfolios, we believe the flexibility of trading in no transaction fee funds may offer advantages over recommending a fund that is subject to transaction fees. Depending on how frequently we buy or sell a fund, the overall cost to the client may actually be lower utilizing the higher expense no transaction fee fund vs. the lower expense transaction fee fund. However, due to the uncertain timing of when a fund rebalance trade may occur (triggering factors include price change of underlying investments in the account, general market volatility, client deposits or withdrawals, and strategy adjustments by the portfolio manager) there is no guarantee that a client will pay lower fees by investing in the no transaction fee funds.

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

Item 12 further describes the factors that AMM considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

AMM is also the investment adviser to the Fallen Angels Income Fund, a series of MSS Funds, an Ohio business trust. AMM receives a management fee equal to 1.00% of the average daily net assets of the fund.

If, and to the extent that, clients of AMM are invested in mutual funds not managed by AMM, they will be paying two advisory fees – AMM's fee and the fee of the adviser to the mutual funds (whose fees are described in the mutual funds' prospectuses).

AMM Principal Gabriel Wisdom has been a shareholder and Director of Monterey Financial Services, Inc. since 1994. Where appropriate, AMM officers and/or representatives may recommend that qualified clients invest in interest bearing one year notes that are issued by Monterey Receivables Funding (MRF), a Monterey Financial company. AMM principals and associates will not receive any additional compensation or referral fees in consideration of recommending AMM client assets to MRF notes. AMM's compensation will continue to be based upon the total asset value of a client's account(s), including any portion invested in MRF notes. Clients who choose to invest in MRF notes will be required to sign an AMM disclosure form explaining Gabriel's role with the company and the aforementioned compensation arrangement.

AMM may periodically recommend clients invest in first trust deeds offered by third parties. See Item 8 for more information on first trust deeds. AMM's compensation related to first trust deeds has been in the form of a "referral fee" paid by the issuer. The client is required by AMM to sign a form that discloses this fee and the conflict of interest before the first trust deed investment is made.

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

In some cases, AMM has entered into performance fee arrangements with qualified clients. Such fees are subject to individualized negotiation with each such client. AMM will structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisors Act of 1940 (The Advisors Act) in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3. Performance-based fee arrangements may create an incentive for AMM to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. AMM has procedures designed and implemented to ensure that all clients are treated fairly and equally and to prevent this conflict from influencing the allocation of investment opportunities among clients.

Item 7 – Types of Clients

AMM provides portfolio management services to individuals, high net worth individuals, investment companies, corporate pension and profit-sharing plans, trusts, estates or charitable organizations, corporations and other businesses. AMM's minimum account size is generally \$100,000; however, accounts under \$100,000 may be accepted on an individual basis at the discretion of AMM.

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

The first step in developing the investment strategies is to determine how much should be invested in stocks, bonds, and diversifying assets like commodities, real estate and/or other assets. This decision is made based on the client's financial condition and goals and in view of current and anticipated market conditions. Once the appropriate asset allocation is determined, suitable investments are selected within the desired asset classes.

Asset Allocation Oriented Investment Strategies

AMM's Asset Allocation Strategies are designed to meet the investment objectives and risk tolerance levels of our diverse range of clients. The target asset allocation (equity vs. fixed income vs. diversifying assets) and the securities included in each strategy are determined at the periodic investment committee meeting. Target allocations are strictly guidelines for a fully invested portfolio. The investment committee and portfolio managers reserve the right to tilt heavily towards cash or overweight certain assets when they deem that it is appropriate to do so. The timing of purchases and sales in accounts within each strategy is determined by the account portfolio manager.

All strategies are customizable, so it is unlikely that all accounts within a certain strategy group will look identical to other accounts in the same group. For example, a taxable account with a low cost basis position may continue to hold the position even though it is not in the current strategy guidelines. Other reasons for strategy deviations may include social/ethical investing preferences, restricted stock positions, liquidity (cash) positions, etc.

Aggressive Growth:

Target allocation: 75-80% equities and 20-25% diversifying assets (commodities, real-estate, etc.). The Aggressive Growth strategy is meant primarily for clients with a high tolerance for risk and a long time horizon (> 10 years). The strategy may be appropriate for clients with shorter time horizons if their investment is one component of a larger portfolio.

Long-Term Growth:

Target allocation: 60-70% equities, 10-20% diversifying assets (commodities, real-estate, etc.) and 10-30% fixed income instruments (including bonds and bond mutual funds). The Long-Term Growth strategy is meant primarily for clients with a healthy tolerance for risk and a long time horizon (>5 years). The strategy will typically have some exposure to fixed income instruments so it is designed to be less volatile than the Aggressive Growth model. The strategy may be appropriate for clients with shorter time horizons if their investment is one component of a larger portfolio strategy.

Balanced:

Target allocation: 40-60% equities, 10-20% diversifying assets (commodities, real-estate, etc.) and 30-50% fixed income instruments (including bonds and bond mutual funds). The Balanced strategy is meant for clients who would like to achieve some growth but with a reduced level of portfolio volatility relative to the Aggressive Growth and Long-Term Growth strategies. Clients should be willing to exchange lower returns relative to the broad equity markets in bullish environments for greater preservation of capital in bearish environments.

Moderate Balanced:

Target Allocation: 30-50% equities, 5-15% diversifying assets (commodities, real-estate, etc.), and 40-60% fixed income instruments (including bonds and bond mutual funds). Typically no more than 50% of the portfolio will be allocated to equities or equity funds.

The Moderate Balanced strategy is meant for clients who would like to achieve some growth but with an even emphasis on portfolio income. Clients should be willing to exchange lower returns relative to the broad equity markets in bullish environments for greater preservation of capital in bearish environments.

Conservative Balanced:

Target allocation: 15-25% equities, 5-10% diversifying assets and 60-80% fixed income instruments (including bonds and bond mutual funds). The Conservative Balanced strategy is

meant for clients who are willing to take some degree of stock market risk to achieve greater returns than they might otherwise achieve in a fixed income only portfolio. The majority of the portfolio will be tilted towards fixed income instruments. Clients should be willing to exchange lower returns relative to the broad equity markets in bullish environments for greater preservation of capital in bearish environments.

Retirement Income:

The Retirement Income strategy is designed for clients wishing to achieve high level of current income who are willing to withstand portfolio volatility and risk of loss of principal in return for high current cash flow.

Conservative Income:

Target allocation: The Conservative Income strategy is designed for clients who desire a reasonable level of current income. Growth of principal is a secondary objective. While clients must assume the various risk types associated with fixed income securities (credit risk, interest rate risk, liquidity risk, etc.), their overall risk tolerance is low and capital preservation is generally the primary objective.

Modified Asset Allocation Strategies:

On request, and depending on the client situation, AMM may develop modified asset allocation strategies to meet a specific client request. For example, a client may desire a significantly different asset mix than that of our primary asset allocation strategies. At our discretion, we may choose to create a separate modified strategy to accommodate this client. Currently, such strategies represent a relatively small amount of total accounts managed.

Equity Investment Strategies

AMM's Equity Strategies are primarily pure stock portfolios for clients seeking exposure to individual stocks. While individual stocks are the primary investment vehicle used in these strategies, accounts may periodically have exposure to exchange traded and open-end mutual funds. AMM Equity Strategies can be used as a standalone strategy in a client account or as an *equity sleeve* within one of our Asset Allocation Strategies.

AMM Dividend Strategy:

The primary objective of the AMM Dividend Strategy is to generate a high level of cash flow from a portfolio of high quality, dividend paying stocks, which will be selected on the basis of both dividend payout and the investment team's assessment of underlying business quality. Additionally, companies selected will generally have a proven history of increasing dividends paid to shareholders. The portfolio manager will seek to purchase stocks when they are trading at a discount to fair value, providing an additional margin of safety along with upside potential.

Investors in the AMM Dividend Strategy also have the option to include "covered call" writing as a component of the strategy. This strategy overlay allows the portfolio manager to sell call

options against portfolio positions with the goal of increasing portfolio income. The determination of whether or not to include “call writing” as part of the strategy is determined at the outset of the client relationship.

The AMM Dividend Strategy is offered as a standalone portfolio or may be included as a “sleeve” in an investor’s broader portfolio allocation (including bonds and other diversifying assets). Investors in this strategy must be willing to accept the risks associated with stock investing, including periods of downside portfolio volatility.

Alternative Investments

AMM may periodically recommend alternative investments to clients as part of their overall asset allocation strategy. These investments may include collateralized notes, first trust deeds, and other private placement offerings. These investments are typically only available to accredited investors and AMM associates will seek to determine a client’s accredited status before making any recommendation related to these offerings. Below we outline the two most common Alternative Investments recommended by AMM.

Collateralized Notes:

AMM may periodically recommend 1 year collateralized notes issued by Monterey Receivables Funding (MRF) as part of the clients overall asset allocation. The notes are income producing instruments and are typically used as part of a client’s overall fixed income allocation.

These notes are private offerings and are only available to accredited investors. The minimum investment in the notes is \$50,000; however the supply of notes is limited. The issuer of the notes commonly closes to new investors (often for many months) so AMM maintains a wait list of clients for whom it feels are suitable candidates for investment. This is generally based on a client’s accreditation status; along with their stated desire for income and/or a client with an asset allocation strategy that includes a reasonable weighting in fixed income instruments. While AMM will do its best to determine those clients for which the notes are suitable, there is no guarantee that all clients that want notes will be able to invest in them.

Collateralized notes have their own set of risks which are outlined in the private placement memorandum (PPM). Accredited clients interested in the notes may request a copy of the PPM by calling American Money Management at 858-755-0909.

First Trust Deeds:

AMM may periodically recommend select first trust deed investments to clients. First trust deeds are real estate loans backed by real property. These investments are income producing instruments and are typically recommended to clients seeking income. AMM has historically sourced these investments through a single developer located in Solana Beach, CA; though we may source additional first trust deeds through other developers and real estate investors in the future. AMM is generally very selective in its recommendation of first trust deeds and many years may go by without any first trust deeds being recommended to clients. Due to this

selectivity and limited supply, there is no guarantee that all clients interested and/or suitable for these investments will be able to make an investment in them.

While first trust deeds are backed by real property, there is no guarantee that this collateral will make the investor whole in the event of a default by the borrower.

Methods of Analysis

AMM employs the following methods of analysis in the investment selection process.

Fundamental Analysis:

Involves the analysis of financial statements and ratios, the general financial health of companies, and/or qualitative factors like management strength and competitive advantages.

Cyclical Analysis:

Involves the analysis of business and economic cycles to determine favorable conditions for buying and/or selling investments.

Economic Analysis:

Involves the analysis of economic trends, monetary and fiscal policy, etc.

Technical Analysis:

Involves the analysis of past market data, primarily price and volume.

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 AMM or the integrity of AMM's management. AMM has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

AMM may receive fees from investment advisers which it recommends.

AMM manages a publicly traded mutual fund: the Fallen Angels Income Fund.

AMM Principal Gabriel Wisdom has been a shareholder and Director of Monterey Financial Services, Inc. since 1994.

AMM officers and representatives may hold state insurance licenses. In general, associates of AMM are not involved in the transacting of insurance business. However, holding insurance

licenses and staying current with the continuing education required of licensees allows representatives that hold the license to speak more knowledgeably about a client's insurance situation in the context of the client's overall financial picture.

Item 11 – Code of Ethics

AMM has adopted a Code of Ethics (the Code) for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and personal securities trading procedures, among other things. All supervised persons at AMM must acknowledge the terms of the Code annually, or as amended.

AMM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which AMM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which AMM, its affiliates and/or clients, directly or indirectly, have a position of interest (including, but not limited to, the AMM FUNDS). AMM's employees and persons associated with AMM are required to follow AMM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of AMM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for AMM's clients. The Code is designed to assure that the personal securities transactions, activities and interests of the employees of AMM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions based upon a determination that these would materially not interfere with the best interest of AMM's clients. In addition, the Code requires pre-clearance of many transactions and restricts trading in close proximity to client trading activity. Nonetheless, because the Code in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between AMM and its clients.

AMM may place some orders with brokers that, at the time of the transaction, include orders for both clients and personnel of AMM. Although the orders may be bunched, the price per share will be allocated equally as an average price per share. Employee trades will be periodically reviewed for any potential insider trading. AMM trades primarily in exchange listed securities, and its trading volume is generally insufficient to affect market prices. There is generally no material financial impact to the employee or to the client.

AMM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting AMM at 858-755-0909.

It is AMM's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. AMM will also not cross trade between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser or any person controlled by or under common control with the investment adviser acts as broker for both the advisory client and for another person on the other side of the transaction.

Item 12 – Brokerage Practices

Factors Used to Select Custodians and/or Broker/Dealers

AMM generally recommends and/or selects (with the written consent of the client in each instance) the Institutional Division of Charles Schwab & Co., Inc. ("Schwab") or TD Ameritrade Inc. From time to time, AMM may also suggest other broker-dealers. Clients may pay commissions in addition to a markup/markdown on over-the-counter trades. Although clients trading through a particular broker-dealer may pay commissions which are higher than those obtainable from other brokers, AMM evaluates the reasonableness of the commissions in light of the full range and quality of a broker's services, including, among other things, the value of research provided as well as execution capability, commission rates, financial responsibility, and responsiveness to AMM's needs.

At present, client accounts managed by AMM are maintained at two broker-dealers Schwab and TD Ameritrade, Inc ("TDA"). When placing orders to purchase or sell securities in accounts, AMM generally places orders for client accounts maintained at Schwab first, then TDA. This may result in a different executed price for client accounts at either broker.

Soft Dollar Practices

"Soft dollar" practices are arrangements under which products or services other than execution of securities transactions are obtained by an investment adviser (such as AMM) from or through a broker-dealer in exchange for the direction by the adviser of client brokerage transactions to the broker-dealer. As indicated above, most of the accounts managed by AMM are custodied with Schwab, and most of the client trades directed by AMM are placed through Schwab. Schwab provides AMM with access to its institutional trading and operations services, which are typically not available to retail investors. These services generally are available to independent investment advisers (such as AMM) at no charge to them so long as a total of at least \$10 million of the clients' account assets are maintained at Schwab. Schwab's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available to institutional investors or would require a significantly higher minimum initial investment.

Schwab also makes available to AMM (and to other advisers) other products and services that benefit AMM but may not benefit its clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements) facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of AMM's fees from its clients' accounts, and assist with back-office support, record keeping and client reporting. Schwab may also provide AMM with other services intended to help AMM manage and further develop its business enterprise including consulting, publications, and presentations on practice management, information technology and regulatory compliance. Schwab makes available or provides those products and services to AMM at no additional cost to AMM, except for AMM's agreement to, on a best effort basis consistent with AMM's duty to obtain best execution, place equity transactions with Schwab. The advisory fees paid to AMM by its clients are not reduced because of AMM's receipt of such services. The availability to AMM of those products and services is not contingent upon AMM committing to Schwab any specific amount of business; but, as a result of receiving such products and services, AMM has an incentive to continue to use Schwab as a custodian of the clients' accounts and to effect transactions in securities for accounts held at Schwab.

Aggregate and Block Trading

In placing its orders to purchase or sell securities in accounts, principals of the firm may elect to aggregate orders, sometimes called "block trading". Trades may be aggregated so that all the participating clients may receive a better average price for their securities, whether bought or sold. In the execution of aggregate trades, AMM will adhere to the following general guidelines.

1. AMM will not aggregate transactions unless aggregation is consistent with its duty to seek best execution and the terms of the investment advisory agreement with each client for which trades are being aggregated.
2. No advisory client will be favored over any other client. Each client that participates in an aggregated order will participate at the average share price for all adviser's transactions in that security on a given business day with transaction costs shared pro-rata based on each client's participation in the transaction.
3. AMM will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients.
4. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will be allocated pro-rata based on the Allocation Statement. Every effort will be made by AMM trade personnel to place trades such that the possibility of a partial fill is minimized.
5. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved

in writing by adviser's compliance officer no later than one hour after the opening of the markets on the trading day following the day the order was executed.

6. AMM books and records will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought and sold for that account.
7. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the client's cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis. Cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement.
8. AMM will receive no additional compensation of any kind as a result of the proposed aggregation.
9. Individual investment advice and treatment will be accorded to each advisory client.

Item 13 – Review of Accounts

REVIEWS: The securities in every client's account will be monitored on a continuous basis. Managed accounts are generally reviewed bi-weekly or more frequently as circumstances warrant. The calendar and/or events relevant to investments are triggering factors.

REVIEWERS: The investment committee members review accounts on a portfolio analysis basis. Although accounts may be assigned as the primary responsibility of one of the investment committee members, the members share responsibility for reviewing all accounts and for making investment decisions.

Clients receive monthly statements of their accounts from the broker(s) having custody of their accounts. Additionally, AMM may provide periodic (quarterly, or per client request) reports to clients including, but not limited to, asset allocation reports, performance analysis reports and portfolio statements.

Item 14 – Client Referrals and Other Compensation

AMM may compensate unrelated third parties for client referrals in accordance with Rule 206 (4)-3 under the Investment Adviser's Act of 1940. The compensation paid to any such third party will typically consist of a cash payment stated as a percentage of AMM's advisory fee.

AMM and/or its officers and representatives may receive compensation for referring clients to private real estate developers who offer first trust deeds secured by real property. While AMM endeavors at all times to put the interest of clients first as part of our fiduciary duty, the

possibility of receiving such compensation in connection with investments in real property or trust deeds creates a conflict of interest and may affect the judgment of these individuals when making recommendations. AMM addresses this conflict by reviewing recommendations made to clients to determine that all recommendations are consistent with the best interest of the clients. Additionally, AMM furnishes each client with a written disclosure of the referral fee to be received.

In the event a client is seeking to buy or otherwise transact insurance business, AMM officers and/or representatives may refer the client to an outside insurance agent. AMM officers and/or representatives may receive a referral fee which will be disclosed to the client at the time of the referral.

Item 15 – Custody

AMM does not take *physical* custody of client accounts at any time; however, the independent custodians will directly debit client account(s) for the payment of AMM advisory fees. Additionally, authorized AMM associates may be granted permission from the client to periodically process money movement transactions, including checks, wires and electronic transfers, on their behalf. AMM is generally granted authorization to process first party (like registration) check and journal requests at the time the account at the custodian is opened. For first party wires and all third party money movement requests, the client must explicitly grant AMM the authority (either one time or via standing instructions) in writing. This ability to deduct AMM's advisory fees and periodically process money movement transactions from client accounts causes AMM to exercise *limited* custody over client funds and/or securities. *However, this ability to debit fees and process money movement transactions does not constitute physical custody of any client funds and/or securities.*

Clients will receive monthly account statements directly from their custodian. AMM urges clients to carefully review such statements and compare such official custodial records to the account statements that may be provided to clients by AMM. AMM statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

AMM 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. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, AMM observes the investment policies,

limitations and restrictions of the clients for which it advises. For registered investment companies, AMM's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to AMM in writing.

Clients may place specific restrictions on this authority. AMM reserves the right to accept or refuse such restrictions.

Item 17 – Voting *Client* Securities

AMM votes proxies for private client accounts. Clients may retain such duties upon request.

AMM outsources proxy voting to Riskmetrics/ISS. Clients may obtain a copy of Riskmetrics/ISS complete proxy voting policies and procedures upon request. Clients may also obtain information from AMM about how any proxies were voted on behalf of their account(s).

Item 18 – Financial Information

AMM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and, therefore, does not need to include a balance sheet with this brochure.

Item 1- Cover Page

Gabriel B. Wisdom

American Money Management, LLC

12429 Rancho Santa Fe Farms Road
Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about Gabriel B. Wisdom that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Gabriel B. Wisdom is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Gabriel Wisdom, born 1950, holds degrees in speech arts (San Diego Mesa College), counseling psychology (Newport University / Janus University, 1978 and 1980), business administration (California Pacific University, 1994), and is a graduate of the Harvard Business School in Boston (1998—[OPM Class 26](#)). He completed the Director Education and Certification Program at UCLA’s Anderson School and is a Certified Director. He holds an Advanced Diploma in Data & Systems Analysis from the University of Oxford. He is also an FAA Certified Pilot/Flight Instructor.

Mr. Wisdom has over 30 years of experience in the securities industry, having served as an Account Executive at Shearson Lehman Brothers, Senior Vice President of Prudential-Bache Securities, and Senior Vice President of Investments with Sutro & Co. Before the establishment of AMM, he was a Managing Director of Private Asset Management, Inc., a registered investment adviser. He is the author of “Wisdom on Value Investing”, and provides commentary for a CBS owned and operated radio station in Los Angeles, California. Investments are discussed during these shows. Gabe was featured in San Diego Magazine as a Five Star Wealth Manager in 2015 and 2017.* He is an advisory board member of the Harvard Business School Alumni Club of San Diego. He also serves as an independent advisor to the San Diego County Treasurer/Tax Collector.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Wisdom is a shareholder & Director of Monterey Financial Services, Inc., a national finance company headquartered in Oceanside, California. The business of Monterey Financial Services is separate from, and unrelated to, American Money Management.

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). Mr. Moore supervises Mr. Wisdom. Together the officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

* Five Star Wealth Managers scored highest in overall satisfaction based on feedback from clients, peers and industry experts. Five Star Wealth Managers met 10 objective eligibility and evaluation criteria associated with wealth managers who provide quality services to their clients. For specific research methodologies, go to www.fivestarpromotional.com.

Item 1- Cover Page

Michael J. Moore
American Money Management, LLC

12429 Rancho Santa Fe Farms Road
Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about Michael J. Moore that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael J. Moore is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Michael J. Moore, *Chief Investment Officer*, born 1976, holds a BS in Finance from Boston College. Mike chairs the Investment Committee; overseeing asset allocation, investment strategy and trading decisions for client portfolios. He designed the firm’s core investment strategies and provides research and analysis to support the investment process. He is a co-founder of AMM Funds and has worked to develop an active value investment strategy that seeks to find high quality businesses at attractive prices. He is a member of the Chartered Financial Analysts Institute and the CFA Society of San Diego. Mike has been featured in San Diego Magazine as a Five Star Wealth Manager from 2010 through 2017.*

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

No information is applicable to this Item

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). Mr. Wisdom supervises Mr. Moore. Together the officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

* Five Star Wealth Managers scored highest in overall satisfaction based on feedback from clients, peers and industry experts. Five Star Wealth Managers met 10 objective eligibility and evaluation criteria associated with wealth managers who provide quality services to their clients. For specific research methodologies, go to www.fivestarprofessional.com.

Item 1- Cover Page

Glenn J. Busch
American Money Management, LLC

12429 Rancho Santa Fe Farms Road
Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about Glenn J. Busch that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Glenn J. Busch is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Glenn J. Busch, born 1979, holds a BS in Animal Physiology and Neuroscience and a Masters in Educational Sciences at the University of California, San Diego. Mr. Busch joined American Money Management, LLC in 2007 and is a portfolio manager for the firm’s individual and retirement accounts. He serves on the firm's investment committee, and plays a key role in the research and selection of income oriented securities (including stocks and bonds) for the firm’s various portfolio strategies. Additionally he is the lead manager for a public mutual fund, The Fallen Angels Income Fund.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

No information is applicable to this Item

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). They supervise Mr. Busch. The two officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

Item 1- Cover Page

James E. Rhodes, CFA

(760) 604-6310

American Money Management, LLC

12429 Rancho Santa Fe Farms Road

Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about James E. Rhodes that supplements the American Money Management, LLC ("AMM") Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM's Brochure or if you have any questions about the contents of this supplement.

Additional information about James E. Rhodes is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

James Earnest Rhodes, born 1946, holds an MBA from the University of California at Berkeley and is a Chartered Financial Analyst. He founded Rhodes Investment Advisory in 1996, which merged with American Money Management in 2006. He was previously a Senior Vice President of a \$2.5 billion family of mutual funds. In 1991, Jim was recognized by the industry trade magazine *Investing* as one of the top 25 retirement fund officers in the country. He has published numerous articles on investments including, "Is Gold an Institutional Investment?", "To Hedge or Not to Hedge?" (currency risk), and "Setting Performance Goals in a Generally Efficient Market". He is a member of the AMM Investment Committee. He previously served on the Imperial County Retirement Board from 2006-2016.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

No information is applicable to this Item

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). They supervise Mr. Rhodes. The two officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

Item 1- Cover Page

Robert Frazier

(619) 507-3988

American Money Management, LLC

12429 Rancho Santa Fe Farms Road

Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about Robert Frazier that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Frazier is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Robert Frazier, born 1956, holds a Bachelor degree in Communications from the University of California, San Diego. After graduating from UCSD, Bob worked as a Financial Analyst with General Dynamics. He then went on to work with the San Diego County Credit Union Member Services as an Investment Adviser. Bob has dedicated his career to helping clients achieve their objectives of early retirement or financial independence. He served as President and Founder of his own Registered Investment Advisory firm from 1995 until it was acquired in 2004. Bob’s clients range from individual investors to private businesses. He has assisted attorneys and accountants in qualified retirement investments and estate planning.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

Bob operates Frazier Consulting, LLC, a consulting practice focused on problem solving and education to business owners and individuals. The businesses of Frazier Consulting is separate from, and unrelated to the business of American Money Management.

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). They supervise Mr. Frazier. The two officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

Item 1- Cover Page

Adele Canetti
(951) 247-5835
American Money Management, LLC
12429 Rancho Santa Fe Farms Road
Rancho Santa Fe, CA 92067
(888) 999-1395
March 17, 2017

This Brochure Supplement provides information about Adele Canetti that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Adele Canetti is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Adele Canetti, born 1958, holds a BA in History from the University of California, Los Angeles and an MBA from the Harvard Business School in Boston. Ms. Canetti joined American Money Management, LLC in 2008. She has been a successful business owner/operator and a Financial Adviser for Morgan Stanley and Merrill Lynch. As a member of the investment committee, Adele provides research and analysis of current and potential investments. She formerly served on the board of the Harvard Business School Alumni Club of Orange County.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

Adele purchased Dollar Book Fair, a used book store in Buena Park, California, in early 2016. Adele is the sole owner of this business. This business is separate from, and unrelated to, American Money Management.

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). They supervise Ms. Canetti. The two officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

Item 1- Cover Page

Mike Green

(858) 551-3130

American Money Management, LLC

12429 Rancho Santa Fe Farms Road

Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about Mike Green that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Mike Green is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Mike Green, born in 1964, holds a BA in Journalism from San Diego State University. He co-founded Benham and Green Capital Management, a Registered Investment Advisor, in 1999 and was a managing member of the firm before joining AMM in September 2013. Prior to co-founding Benham and Green, he was a registered representative of Paine Webber in La Jolla California from 1990 through June 1999.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

No information is applicable to this Item

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (managing director) and Michael Moore (Chief Investment Officer & Chief Compliance Officer). They supervise Mr. Green. The two officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.

Item 1- Cover Page

John Nyaradi

(541) 480-8584

American Money Management, LLC

12429 Rancho Santa Fe Farms Road

Rancho Santa Fe, CA 92067

(888) 999-1395

March 17, 2017

This Brochure Supplement provides information about John Nyaradi that supplements the American Money Management, LLC (“AMM”) Brochure. You should have received a copy of that Brochure. Please contact AMM if you did not receive AMM’s Brochure or if you have any questions about the contents of this supplement.

Additional information about John Nyaradi is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

John Nyaradi, born 1950, is a graduate of Bradley University and former United States Air Force Officer and pilot. He has been a regular contributor to MarketWatch.com and his articles about investing appear on many well-known investment websites. John's book, "Super Sectors," was included among “The Year’s Top Investment Books” in the 2011 Stock Trader’s Almanac. As a career captain for a major airline, John began pursuing his investing passion in between flights to many of the world’s major international destinations. He has more than 35 years’ experience as a commercial pilot and has been a Captain and Check Airman on the Boeing 737, Airbus A320 and Boeing 777.

Item 3- Disciplinary Information

No information is applicable to this Item.

Item 4- Other Business Activities

John is a retired commercial airline pilot and is currently a corporate jet pilot. This activity is separate from, and unrelated to the business of American Money Management.

John is a beneficial owner of Ridgeline Media Group, LLC (“Ridgeline”) which is the publisher of investment related and non-investment related publications. The firm is located in Bend, OR, and has been conducting this activity since April 2007. The firm currently publishes an investment related website, which includes a

subscription service. The subscription service is educational, and can be used as a trading indicator by subscribers. Ridgeline relies on the publisher's exclusion ("impersonalized" investment advice) from the definition of adviser under the Investment Advisers Act of 1940. The business of Ridgeline operates separately from, and is unrelated to, the business of American Money Management.

Item 5- Additional Compensation

No information is applicable to this Item

Item 6 - Supervision

American Money Management's oversight is handled by Gabriel Wisdom (Managing Director), and Michael Moore (Chief Investment Officer, Chief Compliance Officer). They supervise Mr. Nyaradi. The two officers provide supervision of the investment process and portfolio management of American Money Management, LLC. They may be contacted by calling (858) 755-0909.