

Form ADV Part 2A  
Investment Advisor Brochure



**Cover Page**

This Form ADV Part 2A (Investment Advisor Brochure) provides information about the qualifications and business practices of Signature Intelligent Portfolios, LLC ("SIP"). SIP's Privacy Notice and Business Continuity Program is attached to the end of this document.

If you have any questions about the contents of this brochure, please contact us at 844-839-7353 or [operations@seia.com](mailto:operations@seia.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of training.

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

Date of Brochure as Last Revised: November 5, 2018

HEADQUARTERS  
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Los Angeles, California 90067  
Telephone 844-839-7353  
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[www.signatureportfolios.com](http://www.signatureportfolios.com)

Securities offered through Royal Alliance Associates, Inc. member FINRA/SIPC. Investment advisory services offered through SIP, LLC. SIP, LLC is a subsidiary of SEIA, LLC and its investment advisory services are offered independent of Royal Alliance Associates, Inc. Royal Alliance Associates, Inc. is separately owned and other entities and/or marketing names, products or services referenced here are independent of Royal Alliance Associates, Inc.

# Material Changes to Investment Advisor Brochure

## **Summary of Material Changes**

Date of Brochure as Last Revised: January 10, 2018

The purpose of this section is to discuss only material changes since the last annual update of the Signature Intelligent Portfolios, LLC ("SIP") Investment Advisor Brochure.

1. Added language regarding custody in that, under the updated Custody Rule SIP is deemed to have custody for accounts that have certain money movement authorities. SIP is taking the required steps to be in compliance with the criteria outlined in the No-action Letter required for limited custody.
2. Updated language throughout the brochure to reflect the purchase of Signator Investors Inc. by Royal Alliance Associates, Inc. and its parent company Advisor Group. Updates include: changing name of BD, update to Ancillary Services to remove the Solicitor Program to Signator John Hancock Portfolio Solutions

Please review the full document SIP ADV 2A for further information associated with these changes.

**Delivery:** Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment.

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## **Advisory Business**

### **Advisory Firm**

Signature Intelligent Portfolios, LLC is a registered investment advisory firm that provides automated, online investment management services to meet the needs of its clients.

Signature Intelligent Portfolios, LLC ("SIP") is a wholly owned subsidiary of Signature Estate & Investment Advisors, LLC® ("SEIA"), of which the principal owner is Brian D. Holmes. Both SIP and SEIA are Registered Investment Advisers under the Investment Advisers Act of 1940, as amended.

As of December 31, 2017, SIP manages \$2,920,487 of client assets on a discretionary basis.

### **Intelligent Portfolios Program**

SIP provides portfolio management services through Institutional Intelligent Portfolios™, an automated, online investment management platform sponsored by Schwab Wealth Investment Advisory, Inc. (the "Program" and "SWIA," respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange traded funds ("ETFs") and a cash allocation to a sweep program at Charles Schwab Bank (the "Sweep Program"), which is further described below under **Charles Schwab Bank Sweep Program**. The client may instruct us to exclude up to three (3) ETFs from their portfolio. It should be noted that clients are not allowed to make trades in their Program accounts and restrictions on investments in specific securities may not be possible due to the inherent limitations of the Program. The Program is described in the Schwab Wealth Investment Advisory, Inc. Institutional Intelligent Portfolios™ Disclosure Brochure (the "Program Disclosure Brochure"), which is delivered to clients by SWIA during the online enrollment process.

The client's portfolio is held in a brokerage account opened by the client at SWIA's affiliate, Charles Schwab & Co., Inc. ("CS&Co"). SIP is independent of and not owned by, affiliated with, sponsored by or supervised by SWIA, CS&Co or their affiliates (together, "Schwab"). We have contracted with SWIA to provide us with the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects). Clients are eligible for these optional features as long as they meet certain account balance requirements set by the Program.

SIP, and not Schwab, is the client's investment adviser and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. SWIA's role is limited to

delivering the Program Disclosure Brochure to clients and administering the Program so that it operates as described in the Program Disclosure Brochure.

SIP does not receive a portion of a wrap fee for our services to clients through the Program. Clients do not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described below under ***Charles Schwab Bank Sweep Program*** and in the Program Disclosure Brochure.

### **Charles Schwab Bank Sweep Program**

The Sweep Program is a feature of the Program required by SWIA. Each investment strategy involves a cash allocation to the Sweep Program. The cash allocation will be a mandatory minimum of 4% of the account's value to be held in cash, and may be higher, depending on the chosen investment strategy and the amount of the cash allocation set for that investment strategy. Charles Schwab Bank, an FDIC-insured depository institution that is a Schwab affiliate, earns income on the Cash Allocation for each investment strategy, creating a potential conflict of interest for SWIA. Additional details regarding the Sweep Program are described further in the Program Disclosure Brochure.

### **Potential Conflicts of Interest**

SIP does not pay SWIA fees for its services in the Program so long as we meet certain conditions specified by SWIA in our agreement with them. We have a potential incentive to recommend or require that clients with accounts managed by our affiliates (but not enrolled in the Program) be maintained with CS&Co due to this arrangement. This arrangement is described in detail below under ***Brokerage Practices***.

### **Fees and Compensation**

#### **Advisory Fees**

Fees are computed as an annualized percentage of assets under management including cash balances and accrued interest. Fees for services rendered by SIP shall be calculated as an annualized fee of 0.5% for all accounts over \$5,000.

The fees are payable quarterly in arrears. Fees begin accruing when accounts become linked to us or when funded. To allow for additional account setups, transfers, final strategy discussions, etc., at our discretion, SIP can delay the initial fee accrual date up to 45 days. Written agreement between the client and Financial Advisor is required for fee accrual date delays beyond 45 days. The first payment is assessed and due at the end of the first calendar quarter and will be assessed pro rata in the event the Agreement is executed at any time other than the first day of the current calendar quarter. Subsequent payments are due and will be assessed on the first day after the end of each calendar quarter based on the value of the account assets under supervision as of the close of business on the last business day of that quarter. Fees may be waived at our discretion, on the value of large deposits made shortly before the end of the quarter.

## **General Fee Disclosures**

Fees are automatically deducted from clients' accounts. Clients authorize the custodian holding client funds and securities to deduct SIP advisory fees from their managed accounts. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals by SIP. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

As described in **Advisory Business**, clients do not pay fees to SWIA or brokerage commissions or other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure. SIP' fees are not set or supervised by Schwab. Brokerage arrangements are further described below under **Brokerage Practices**.

## **Performance-Based Fees And Side-By-Side Management**

SIP does not charge performance-based fees. (A fee that is based on gains in the client account.)

## **Types of Clients and Account Minimums**

Clients eligible to enroll in the Program include individuals, IRAs and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000. The Program Disclosure Brochure describes related minimum required account balances for maintenance of the account, automatic rebalancing, and tax-loss harvesting.

## **Methods of Analysis, Investment Strategies**

SIP's **D**epartment of **I**nvestment **M**anagement and **E**conomic **S**trategy ("DIMES") is responsible for constructing investment strategies for the Program that consist of diversified portfolios of ETFs combined with a cash allocation in a single account pursuant to investment parameters provided by clients during the online enrollment process. DIMES may at their own discretion add, remove, or change investment strategies used in the Program.

DIMES uses the principles found in Modern Portfolio Theory, proprietary research, and third-party research. Underlying this approach is:

- Strategic Macro Asset Allocation, which is based on asset class and style through the use of computer software models, based on capital market assumptions and modern portfolio theory principles.
- Tactical Micro Allocation, which is based on business cycle, global and domestic macro / micro-economic conditions and other potential event-driven opportunities.

DIMES analysis and investment selection are driven by a two-prong approach to filter the universe of ETFs for inclusion in the investment strategies:

- Quantitative metrics focus on identifying potential investments with consistent, good risk-adjusted performance returns based on mathematical and statistical methods and analysis.
- Qualitative metrics focus on the “quality” of potential investments that meet the above quantitative standards. DIMES focuses on attributes of investments that cannot be directly captured by quantitative measurement.

## **Risk of Loss**

While the automated investing platform offered by the Program may offer many benefits for the client, including low cost and ease of use, clients should also be aware of the risks and limitations of using these types of automated tools. The algorithm employed by the Program to maintain clients’ portfolios may rely on assumptions that could be incorrect or do not apply to your individual situation. For example, the algorithm may be programmed to use economic assumptions that will not react to shifts in the market. If the algorithm assumes that interest rates will remain low but, instead, interest rates rise, the algorithm’s output will be flawed. In addition, the Program, like other investment programs, is designed to consider limited options. For example, the written parameters established by SWIA for the Program place limitations on the universe of ETFs that SIP may include in clients’ portfolios (these parameters for inclusion in the Program are described in the Program Disclosure Brochure).

The Program Disclosure Brochure includes a discussion of various risks associated with the Program, including the risks of investing in ETFs, as well as risks related to the underlying securities in which ETFs invest. In addition, the Program Disclosure Brochure also discusses market/systemic risks, asset allocation/strategy/diversification risks, investment strategy risks, trading/liquidity risks, and large investment risks.

## **Disciplinary Information**

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client’s evaluation of the advisory business or of the integrity of its management personnel.

SIP does not have any disclosure items.

## **Other Financial Industry Activities and Affiliations**

SIP is not, but the IARs of the firm are licensed as Registered Representatives with Royal Alliance Associates, Inc. ("RA"). RA is a general securities broker/dealer, member FINRA & SIPC. RA is a wholly-owned subsidiary of Advisor Group, Inc. ("AG"). AG is one of the largest networks of independent wealth management firms in the United States. The four individual firms that comprise Advisor Group are Royal Alliance Associates, FSC Securities Corporation, SagePoint Financial, and Woodbury Financial Services.

Some IARs of SIP are also IARs of Signature Estate & Investment Advisors, LLC ("SEIA"). Both SIP and SEIA are RIAs. IARs and other associated persons of SEIA may also act in other capacities, and would have additional disclosures if/when acting under SEIA. It is not anticipated that SIP clients will be clients of SEIA. However, if a client were to receive services of SEIA, then the client would receive the SEIA disclosure document. SIP and SEIA have shared personnel.

Financial Advisors of SIP may also act as Financial Advisors for Signature Estate & Investment Advisors, LLC ("SEIA") and/or Signature Investment Advisors, LLC ("SIA"). SIP, SEIA and SIA are all RIAs and all offer investment advisory services and have shared personnel. SIP provides services to clients referred by SEIA, its parent company. Financial Advisors may also act in other capacities as associated persons of SEIA and SIA, and would have additional disclosures if/when acting under SEIA or SIA. If a client were to receive services of SEIA or SIA, then the client would receive the SEIA or SIA disclosure document.

SIP's parent company, SEIA, has other affiliated companies, Signature Comprehensive Insurance Services LLC ("SCIS") (for processing fixed insurance other than JHUSA) & Signature Estate & Insurance Services LLC ("SEIS") (for processing JHUSA fixed insurance). It is not anticipated that SIP clients will be clients of SCIS or SEIS. However, if a client were to receive services of SCIS or SEIS, then the client would receive proper disclosure. SIP and SCIS / SEIS have shared personnel.

## **Code of Ethics, Participation/Interest in Client Transactions, Personal Trading**

### **Code of Ethics**

SIP maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel; requires compliance with federal securities laws; and, addresses conflicts that arise from personal trading by advisory personnel. Clients may request a copy of the Code of Ethics.

### **Participation or Interest in Client Transactions**

Charles Schwab Investment Management, Inc. (CSIM), a Schwab affiliate, earns revenues from Exchange Traded Funds ("ETFs") held in Program accounts. CSIM may earn additional revenues from Schwab's proprietary ETFs held in Program accounts.

SIP is independent of and not owned by, affiliated with, or sponsored or supervised by Schwab, and does not receive any portion of this compensation.

### **Employee Personal Trading**

SIP's policy is designed to avoid conflicts of interest with our clients. We will not violate the Advisor's fiduciary responsibilities to our clients. At times the interests of SIP and/or its access persons correspond with our client's interests, and then we may invest in the same securities that are recommended to clients. Additionally, these access persons may trade in securities not recommended to clients, when the investment objectives differ. Financial Advisors may take more or less risk in their personal investing compared to what is recommended to clients. We are mindful that SIP and its access persons shall not misappropriate an investment opportunity that should first be offered to eligible clients.

SIP has a comprehensive personal trading policy designed to supervise employees personal trading activities. SE=IA monitors its access persons' personal security transactions on an on-going basis.



Should a conflict occur because of materiality (i.e. a purchase or sale of an access person's prior holding of a thinly traded security), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale of an access person's prior holding of a security which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

SIP and its access persons will keep records of all personal securities transactions whether done through the firm or not.

### **Principal Trades**

SIP does not participate in Principal trades.

## **Brokerage Practices**

### **Selection or recommendation of broker/dealers**

In addition to our portfolio management and other services, the Program includes the brokerage services of CS&Co, a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co by entering into an account agreement directly with CS&Co. We do not open the account for the client. If the client does not wish to place his or her assets with CS&Co, then we cannot manage the client's account through the Program. As described in the Program Disclosure Brochure, SWIA may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Program.

### **Soft Dollar Practices**

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, CS&Co provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services – trading, custody, reporting and related services – many of which are not typically available to CS&Co retail customers. CS&Co also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. CS&Co's support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

**Services that Benefit You.** CS&Co's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which the client might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. CS&Co's services described in this paragraph generally benefit the client and the client's account.

**Services that May Not Directly Benefit You.** CS&Co also makes available to us other products and services that benefit us but may not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

**Services that Generally Benefit Only Us.** CS&Co also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

CS&Co may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. CS&Co may also provide us with other benefits such as occasional business entertainment of our personnel.

The availability of services from CS&Co benefits us because we do not have to produce or purchase them. We don't have to pay for these services, and they are not contingent upon us committing any specific amount of business to CS&Co in trading commissions or assets in custody. With respect to the Program, as described above under **Advisory Business**, we do not pay SWIA fees for its services in connection with the Program so long as we maintain \$100 Million in client assets in accounts at CS&Co that are not enrolled in the Program. If we do not meet this condition, then we pay SWIA an annual fee of 0.10% (10 basis points) on the value of our clients' assets in the Program. In light of our arrangements with Schwab, we may have an incentive to recommend or require that clients maintain their accounts not enrolled in the Program with CS&Co based on our interest in receiving Schwab's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. We believe, however, that our selection of CS&Co as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of CS&Co's services and not Schwab's services that benefit only us. We have adopted policies and procedures designed to ensure that our use of Schwab's services is appropriate for each of our clients.

### **Client Referrals from Brokers**

See the main section heading **Client Referrals & Other Compensation** (below) for disclosure.

### *Trade Aggregation*

Trade orders for client portfolios are generated by SWIA's automated investment engine and as such we have nothing to disclose.

## ***Review of Accounts and Reports on Accounts***

### *Review of Accounts*

Clients' portfolios are reviewed and approved when they are initially opened. More frequent reviews may be triggered by material changes in the client's financial situation or investment objectives and major market or economic events. Clients who have experienced material changes in their financial situation or investment objectives should promptly update their information on the Program website.

SIP's Department of Investment Management and Economic Strategy ("DIMES") monitors and makes any necessary updates to the portfolio strategies available in the Program a continuous basis.

### *Reports on Accounts*

We do not provide written reports to clients, unless asked to do so. Clients will receive standard account statements from the qualified custodian or investment sponsor.

## ***Client Referrals & Other Compensation***

### *Compensation for Client Referrals*

SIP may compensate for client referrals. All solicitors' agreements are in compliance with the Investment Advisers Act of 1940. In addition, all applicable federal and state laws will be observed. All clients procured by outside solicitors will be given full written disclosures by the solicitor, describing the terms and fee arrangements between SIP and the solicitor, prior to or at the time of entering into the advisory agreement.

SIP has entered into an agreement with SEIA to compensate for client referrals. SIP pays all solicitor fees under this arrangement to SEIA.

### *Other Compensation Arrangements*

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under ***Brokerage Practices***. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## **Custody**

SIP has limited custody of some of our clients' funds or securities when the clients authorize us to deduct our management fees directly from the client's account. SIP is also deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from a client's account to a third-party ("SLOA") and under that SLOA authorize us to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow.

A qualified custodian holds clients' funds and securities. Clients will receive statements directly from their qualified custodian at least quarterly. The statements will reflect the client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee.

Clients should carefully review the account statements they receive from the qualified custodian. When clients receive statements from SIP as well as from the qualified custodian, they should compare these two reports carefully. Clients with any questions about their statements should contact us at the address or phone number on the cover of this brochure. Clients who do not receive a statement from their qualified custodian at least quarterly should also notify us.

Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes.

## **Investment Discretion**

SIP has discretionary authority to manage accounts enrolled in the Program. This discretionary authority is subject to the reasonable restrictions requested by Program clients and accepted by SIP, as applicable. SIP will not have authority to withdraw funds or to take custody of client funds or securities, other than as described under **Custody** above.

Subject to meeting minimum balance requirements, a client may also direct SIP to employ a tax-loss harvesting strategy in managing the client's taxable account. This means that ETFs in client's account(s) will be sold at a loss to offset a potential capital gains tax liability. The rebalancing and tax-loss harvesting opportunities may be affected by programming limitations and information clients make available to SWIA. In addition, clients may restrict up to three ETFs (limited to one per asset class or sub-asset class) in each Program account. It should be noted that ETFs designated for restriction by clients will be replaced with alternatives selected by SIP, in which case the client will forego the opportunity for tax-loss harvesting from this asset class. For more information about tax-loss harvesting and rebalancing strategies, please refer to the Program Disclosure Brochure.

## **Voting Client Securities**

SIP does not vote proxies and does not offer advice on corporate actions. As described in the Program Disclosure Brochure, clients enrolled in the Program designate SWIA to vote proxies for the ETFs held in their accounts. We have directed SWIA to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third party proxy voting service provider

retained by SWIA for this purpose. Additional information about this arrangement is available in the Program Disclosure Brochure. Clients who do not wish to designate SWIA to vote proxies may retain the ability to vote proxies themselves by signing a special CS&Co form available from us. Questions about proxies may be made via the contact information on the cover page.

### **Financial Information**

An investment advisor must provide financial information if a threshold of fee prepayments is met or, if there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years.

SIP does not have any disclosure items in this section.



**SIGNATURE**  
INTELLIGENT PORTFOLIOS

**Form ADV Part 2B**  
**Brochure Supplement**

Name of Supervised Person/IA Rep	Deron McCoy
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-712-2323
Date of Brochure as Last Revised:	November 5, 2018

Name of Registered Investment Advisor	Signature Intelligent Portfolios, LLC ("SIP")
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	844-839-7353
Website Address	<a href="http://www.signatureportfolios.com">www.signatureportfolios.com</a>

This Brochure Supplement provides information about Deron McCoy that supplements the Signature Intelligent Portfolios, LLC brochure. You should have received a copy of that brochure. Please contact SIP's Compliance Department via the contact information on the cover page if you did not receive Signature Intelligent Portfolios, LLC's brochure or if you have any questions about the contents of this supplement. Additional information about Deron McCoy is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Deron McCoy is the Chief Investment Officer for SEIA's Department of Investment Management and Economic Strategy ("DIMES"). DIMES is responsible for the research and development of SIP's portfolio allocation targets.

## ***Educational Background and Business Experience***

### **Education and Business Background**

Name: Deron McCoy, CFA, CFP®, CAIA, AIF®  
Year of Birth: 1972  
Education: University of California Los Angeles (UCLA), Los Angeles, CA  
BS Mathematics-Applied Science, Specialization in Economics, 1995  
Business: SEIA/SIA/SIP, Los Angeles, CA – Chief Investment Officer, DIMES  
SEIA - 9/2001 – present; SIA - 11/2011 – present; SIP - 10/2015 – present  
Royal Alliance Associates, Inc., Los Angeles, CA – Registered Representative  
11/18 – present  
Signator Investors, Inc., Los Angeles, CA – Registered Representative  
6/95 – 11/18

### **Professional Designations Qualifications**

**CFP®** - Certified Financial Planner is issued by the Certified Financial Planner Board of Standards, Inc. Candidates must meet the following requirements:

- Complete CFP® education program or fulfillment by other specified credential
- Bachelor's degree (or higher) from an accredited college or university
- Pass CFP® certification exam
- 3 years of full-time personal financial planning experience
- Continuing education requirement of 30 hours every 2 years

**CFA** – Chartered Financial Analyst is issued by the CFA Institute

CFA certificants must meet the following requirements for regular membership:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience
- Complete and pass the CFA Program – a graduate-level self-study program culminating in three sequential six-hour exams
- Have at least 4 years of qualified work experience in the investment decision-making process
- Fulfill society requirements; which require two sponsor statements as part of each application
- Commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct
- Must be a regular member

**CAIA** - Chartered Alternative Investment Analyst

Candidates must meet the following requirements:

- Successfully pass both the Level I and Level II exams
- Become a member of the CAIA Association
  - Pass the Level II exam within three years of passing the Level I exam
  - Hold a U.S. bachelor's degree or the equivalent, and have more than one year of professional experience
  - Agree on an annual basis to abide by the Member Agreement

## **AIF® - Accredited Investment Fiduciary**

Candidates must meet the following requirements:

- Complete the AIF training program
- Pass the final certification exam
- Continuing education requirement of 6 hours per year

### ***Disciplinary Information***

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. Deron McCoy does not have any disclosure items.

### ***Other Business Activities***

Deron McCoy is the Chief Investment Officer for Signature Estate & Investment Advisors, LLC ("SEIA"), Signature Investment Advisors, LLC ("SIA") and Signature Intelligent Portfolios, LLC ("SIP"). SIA and SIP are subsidiary companies of SEIA. Each entity is a Registered Investment Advisor ("RIA"). This activity does not pose a conflict of interest.

Deron McCoy is a Registered Representative with Royal Alliance Associates, Inc. ("RAA"), a Broker-Dealer, member FINRA/SIPC. This activity does not pose a conflict of interest as Mr. McCoy does not sell securities or insurance products.

### ***Additional Compensation***

Deron McCoy receives a portion of revenues derived from management of *discretionary* services offered through the Department of Investment Management. Mr. McCoy does not receive any securities commissions.

### ***Supervision***

Deron McCoy serves on the Investment Committee, which provides research and formulates investment strategies. Mr. McCoy will apply the asset allocation strategy as he sees fit to *discretionary* client accounts. The Investment Committee performs oversight. Further, Deron McCoy is supervised by the CEO, Brian D. Holmes. The CEO has created a Compliance Department to assist in monitoring for compliance with the Advisors Act. The CEO may be contacted at 310-712-2323.



## Privacy Notice

### **NOTICE OF PRIVACY OF CONSUMER FINANCIAL INFORMATION**

Respect for clients' privacy is highly valued at Signature Intelligent Portfolios, LLC and its affiliated company Signature Estate & Investment Advisors, LLC ("we") and your privacy is important to us. We understand that the trust you have placed in us is conditional upon our proper handling of your personal information.

Federal law gives you the right to know what information is being collected about you and how the information will be used.

We collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates, or others; and
- Information that you specifically have had your other professional advisors forward to us.

We do not disclose any non-public personal information about our customers or former customers to anyone, except as required by federal or state law, or as directed by you – our customer.

- Under the law, we may disclose all of the information we collect to companies that perform support services on our behalf as necessary to affect, administer, or process a transaction, or for maintaining and servicing your account.
- As directed by you, we will be working with your other professional advisors and we will provide information in our possession that is reasonably requested by other advisors.

We do not give or sell information about you or your accounts to any other company individual or group.

We restrict access to non-public personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, administrative, and technical procedural safeguards that comply with federal standards to guard your non-public personal information.

You do not need to call or do anything as a result of this notice. It is meant to inform you of how we safeguard your non-public personal information.

Should you have any questions regarding our privacy procedures, please feel free to contact us at 844-839-7353.

## **Business Continuity Program**

Signature Intelligent Portfolios, LLC and its affiliated company Signature Estate & Investment Advisors, LLC seek to provide uninterrupted client service. We believe the stability of our business practices, as well as our technology systems, is vital to earning your trust, therefore we make every effort to provide uninterrupted service through a Business Continuity Plan aligned with rigorous SEC and FINRA requirements.

In the event of a natural or unnatural disaster that interrupts our normal business operations at our corporate headquarters at 2121 Avenue of the Stars, in Los Angeles, California 90067; our comprehensive Business Continuity Plans include but are not limited to the following:

Pre-defined alternate worksites and communications systems for all business-critical functions.

- 610 Newport Center Dr. Suite 300, Newport Beach, CA 92660 Ph 949-705-5188 or 800-472-1066 Fax 949-705-5199
- 155 N. Lake Ave., Suite 780, Pasadena, CA 91101 Ph 626-795-2944 Fax 626-795-2994
- 1650 Tysons Blvd, Suite 1575, Tysons Corner, VA 22102 Ph 703-940-3000 Fax 703-738-2259
- 1848 S. Elena Ave., Suite 100, Redondo Beach, CA 90277 Ph 310-712-2322 Fax 310-712-2377
- 3 East Third Ave., #217, San Mateo, CA 94401 Ph 800-723-5115 Fax 310-712-2345
- 1700 Post Oak Boulevard, 2Blvd Place, Suite 600, Houston, Texas 77056 Ph 713-963-4699 Fax 310-712-2345
- Multiple layer data backup and recovery systems.
- Various methods of communicating with and providing service to clients via the Internet, local offices and automated telephone forwarding services.
- Annual employee awareness and Business Continuity training.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, we continually assess, test, and update our Plan to mitigate all reasonable risk.

If we find it necessary to temporarily move our operations, we will attempt to notify you. Please understand that this may take from 24 to 48 hours or longer.

Please refer to the Business Continuity Programs of your custodian for additional key information. A complete copy of our Business Continuity Plan may be viewed in our office during regular business hours.

Sincerely,



Brian D. Holmes, MS, CFP®, CMFC, AIF®  
President, CEO