

# **Arch Global Advisors, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: December 23, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Arch Global Advisors, LLC (“Arch Global Advisors” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (212) 991-8807 or by email at [info@archga.com](mailto:info@archga.com).

Arch Global Advisors is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Arch Global Advisors to assist you in determining whether to retain the Advisor.

Additional information about Arch Global Advisors and its advisory persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 297397.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Arch Global Advisors. For convenience, we have combined these documents into a single disclosure document.

Arch Global Advisors believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Arch Global Advisors encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- Effective December 1, 2019 our office location moved to 420 Madison Avenue, Suite 1202, New York, NY 10017

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 297397. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (212) 991-8807 or by email at [info@archga.com](mailto:info@archga.com).

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## Item 4 – Advisory Services

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### A. Firm Information

Arch Global Advisors, LLC (“Arch Global Advisors” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. Arch Global Advisors was founded in March 2011 and became a registered investment advisor in June 2018. Arch Global Advisors is owned and operated by Sardar S. Iftikhar (Managing Partner) and Akhil Kumar (Partner and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Arch Global Advisors.

### B. Advisory Services Offered

Arch Global Advisors offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

Arch Global Advisors provides customized advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and financial planning services. Arch Global Advisors works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. Arch Global Advisors customizes its investment management services for its Clients. Arch Global Advisors will implement the investment strategy with its internal management and/or the use of unaffiliated money managers or investment platforms (as described below).

*Internal Investment Management* - Portfolios are typically constructed using exchange-traded funds (“ETFs”), individual equity securities, and/or open-end mutual funds. The Advisor may utilize other types of investments, as appropriate, to meet the needs of certain Clients. The Advisor may also retain certain legacy securities, if appropriate for the investment strategy, asset allocation and portfolio construction.

Arch Global Advisors generally employs a long-term investment approach for Clients, but may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Arch Global Advisors will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Arch Global Advisors will provide investment management and related advisory services. At no time will Arch Global Advisors accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client Investment Advisory Agreement.

*Use of Independent Managers* - Arch Global Advisors may recommend to Clients that all or a portion of their investment portfolio be implemented by utilizing one or more unaffiliated money managers or investment platforms (collectively “Independent Managers”). Independent Managers may be sourced directly or accessed through an investment management platform. The Client will be required to enter into a separate agreement with the Independent Manager[s].

Arch Global Advisors serves as the Client’s primary advisor and relationship manager. However, the Independent Manager[s] will assume discretionary authority for the day-to-day investment management of those

assets placed in their control. Arch Global Advisors will assist and advise the Client in establishing investment objectives for their account[s], the selection of the Independent Manager[s], and defining any restrictions on the account[s]. Arch Global Advisors will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities of these unaffiliated parties. The Independent Manager[s] will implement the selected investment strategies based on their investment mandates. The Client may be able to impose reasonable investment restrictions on these accounts, subject to the acceptance of these third parties.

At no time will Arch Global Advisors accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement, please see Item 12 – Brokerage Practices.

#### Financial Planning Services

Arch Global Advisors will typically provide to its Clients a variety of financial planning services. Such services may be included in the overall advisory services or contracted separately, based on the Client's needs and complexity of the services to be provided. Services may be provided in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, distributions, personal savings, education savings, spending, insurance needs, estate planning, charitable strategies, and other areas of a Client's financial situation. Arch Global Advisors may deliver specific planning modules to the Client or a comprehensive plan, based on the needs of the Client.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Arch Global Advisors may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. Financial planning services may be included in an overall wealth management engagement or provided as a separate service, pursuant to the terms of the agreement with the Client.

#### Retirement Plan Advisory Services

Plan Sponsors may engage Arch Global Advisors to serve as a 3(38) Fiduciary to their plan and assume investment discretion over the Plan. In such instances, the Plan Sponsor shall authorize this discretion to select and implement the Plan investment options. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

### C. Client Account Management

Prior to engaging Arch Global Advisors to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Arch Global Advisors, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Arch Global Advisors will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Arch Global Advisors will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Arch Global Advisors will provide investment management and ongoing oversight of the Client's investment portfolio.

### D. Wrap Fee Programs

Arch Global Advisors does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Arch Global Advisors.

### E. Assets Under Management

As of December 31, 2018, the Advisor manages approximately \$39,153,782 in discretionary assets. Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more agreements with the Advisor.

### A. Fees for Advisory Services

#### Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior quarter. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Standard Annual Rate (%)
Up to \$500,000	2.50%
\$500,001 to \$1,000,000	2.00%
\$1,000,001 to \$2,500,000	1.50%
\$2,500,001 to \$5,000,000	1.25%
\$5,000,001 to \$10,000,000	1.00%
Over \$10,000,000	0.85%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Arch Global Advisors will be independently valued by the Custodian. Arch Global Advisors will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

### Financial Planning Services

Arch Global Advisors offers financial planning services for a fixed engagement fee ranging from \$750 to \$1,500. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total costs will be determined prior to engaging for these services.

### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 2.50%, billed quarterly in advance, pursuant to the terms of the retirement plan advisory agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior calendar quarter and are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Standard Annual Rate (%)</b>
Up to \$500,000	2.50%
\$500,001 to \$1,000,000	2.00%
\$1,000,001 to \$2,500,000	1.50%
\$2,500,001 to \$5,000,000	1.25%
\$5,000,001 to \$10,000,000	1.00%
Over \$10,000,000	0.85%

## **B. Fee Billing**

### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Arch Global Advisors at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Arch Global Advisors directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Arch Global Advisors, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by Arch Global Advisors are separate and distinct from these custody and execution fees.

In addition, all fees paid to Arch Global Advisors for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Arch Global Advisors, but would not receive the services provided by Arch Global Advisors which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the



fund[s] and the fees charged by Arch Global Advisors to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management Services

Arch Global Advisors is compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Financial Planning Services

Arch Global Advisors requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

##### Retirement Plan Advisory Services

Arch Global Advisors is compensated for its services at the beginning of the quarter before advisory services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Advisory Persons are also registered representatives of Cambridge Investment Research Inc. ("Cambridge"), a registered broker-dealer and member of FINRA, SIPC. In one's separate capacity as a registered representative Cambridge, an Advisory Person may implement securities transactions under Cambridge and not through Arch Global Advisors. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities. Compensation earned by the Advisory Person in one's capacity as a registered representative is separate from the Advisor's fees. This practice presents a conflict of interest because the Advisory Person who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client's needs. Clients are not obligated to implement any recommendation provided by the Advisor nor its Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please see Item 10.

Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, Advisory Person may earn commission-based compensation for selling insurance products. Insurance commissions earned are separate and in addition to the Advisor's advisory fees. This practice presents a conflict of interest because the Advisory Person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.



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

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Arch Global Advisors does not charge performance-based fees for its investment advisory services. The fees charged by Arch Global Advisors are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Arch Global Advisors does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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Arch Global Advisors offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and retirement plans. Arch Global Advisors generally does not impose a minimum size for establishing a relationship.

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

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### **A. Methods of Analysis**

Arch Global Advisors primarily employs fundamental, technical, and other analysis methods in developing investment strategies for its Clients. Research and analysis from Arch Global Advisors are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Arch Global Advisors will be able to accurately predict such a reoccurrence.

As noted above, Arch Global Advisors generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Arch Global Advisors will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Arch Global Advisors may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Arch Global Advisors will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis

may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Arch Global Advisors or any of its Supervised Persons.** Arch Global Advisors values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 297397.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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#### Broker-Dealer Affiliation

As noted in Item 5, Advisory Persons are also registered representatives of Cambridge. In one's separate capacity as a registered representative, an Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person. Neither the Advisor nor its Advisory Persons will earn ongoing

investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative.

#### Insurance Agency Affiliations

As noted in Item 5, Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Arch Global Advisors. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

Sardar S. Iftikhar has purchased warrants in Lion Street a general insurance company, which offers him the right to buy stock in an insurance company in the future. Clients are under no obligation to implement insurance recommendations through Lion Street.

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

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#### **A. Code of Ethics**

Arch Global Advisors has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Arch Global Advisors (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Arch Global Advisors and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Arch Global Advisors' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (212) 991-8807 or via email at [info@archga.com](mailto:info@archga.com).

#### **B. Personal Trading with Material Interest**

Arch Global Advisors allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Arch Global Advisors does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Arch Global Advisors does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

Arch Global Advisors allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Arch Global Advisors requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While Arch Global Advisors allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Arch Global Advisors, or any Supervised Person of Arch Global Advisors, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Arch Global Advisors does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will select the broker-dealer/custodian (herein collectively the "Custodian") to safeguard Client assets and authorize Arch Global Advisors to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Arch Global Advisors does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Arch Global Advisors does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Arch Global Advisors. Due to the affiliation that registered representatives have with Cambridge, the Advisor may be limited in using other broker-dealers/custodians as Cambridge must approve the use of any outside broker-dealer/custodian.

Arch Global Advisors will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Arch Global Advisors maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Arch Global Advisors does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from Schwab. Please see Item 14.**

**2. Brokerage Referrals** - Arch Global Advisors does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Arch Global Advisors will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Arch Global Advisors will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Arch Global Advisors will execute its transactions through the Custodian as authorized by the Client. Arch Global Advisors may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## Item 13 – Review of Accounts

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### A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Principals of the Advisor. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Arch Global Advisors if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## Item 14 – Client Referrals and Other Compensation

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### A. Compensation Received by Arch Global Advisors

Arch Global Advisors may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Arch Global Advisors may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

Arch Global Advisors has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Arch Global Advisors. As a registered investment advisor participating on the Schwab Advisor Services platform, Arch Global Advisors receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

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#### Arch Global Advisors, LLC

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*Services that May Only Benefit the Advisor* – Schwab also offers other services and support to Arch Global Advisors that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Arch Global Advisors believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B. Client Referrals from Solicitors**

Arch Global Advisors does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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Arch Global Advisors does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Arch Global Advisors to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Arch Global Advisors to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

### **Item 16 – Investment Discretion**

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Arch Global Advisors generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Arch Global Advisors. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Arch Global Advisors will be in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

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Arch Global Advisors does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither Arch Global Advisors, nor its management, have any adverse financial situations that would reasonably impair the ability of Arch Global Advisors to meet all obligations to its Clients. Neither Arch Global Advisors, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Arch Global Advisors is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



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

**for**

**Akhil Kumar  
Partner and Chief Compliance Officer**

**Effective: December 20, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Akhil Kumar (CRD# 4716564) in addition to the information contained in the Arch Global Advisors, LLC (“Arch Global Advisors” or the “Advisor”, CRD# 297397) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Arch Global Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (212) 991-8807 or by email at [info@archga.com](mailto:info@archga.com).

Additional information about Mr. Kumar is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4716564.

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## Item 2 – Educational Background and Business Experience

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Akhil Kumar, born in 1980, is dedicated to advising Clients of Arch Global Advisors as a Partner and the Chief Compliance Officer. Mr. Kumar earned a Bachelor of Arts in Economics, Finance and Management from Manhattanville College in 2003. Additional information regarding Mr. Kumar's employment history is included below.

### Employment History:

Partner and Chief Compliance Officer, Arch Global Advisors, LLC	07/2018 to Present
Registered Representative, Cambridge Investment Research Inc.	07/2018 to Present
Financial Advisor, Voya Financial Advisors, Inc.	04/2011 to 07/2018
Investment Advisor Representative, National Securities Corporation	07/2007 to 04/2011

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Kumar.*** Mr. Kumar has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kumar.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kumar.***

However, we do encourage you to independently view the background of Mr. Kumar on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4716564.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Kumar is also a registered representative of Cambridge Investment Research Inc. ("Cambridge"). Cambridge is a registered broker-dealer (CRD# 39543), member FINRA, SIPC. In Mr. Kumar's separate capacity as a registered representative, Mr. Kumar will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kumar. Neither the Advisor nor Mr. Kumar will earn any investment advisory fees in connection with any products or services implemented in Mr. Kumar's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Kumar is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Kumar's role with Arch Global Advisors. As an insurance professional, Mr. Kumar may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kumar is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kumar or the Advisor.

## Item 5 – Additional Compensation

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Mr. Kumar has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Kumar serves as a Partner and the Chief Compliance Officer of Arch Global Advisors. Mr. Kumar can be reached at (212) 991-8807.

Arch Global Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Arch Global Advisors. Further, Arch Global Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Arch Global Advisors and its Supervised Persons. As a registered entity, Arch Global Advisors is subject to examinations by regulators, which may be announced or unannounced. Arch Global Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Sardar (Sheraz) Iftikhar**  
**Managing Partner**

**Effective: December 20, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Sardar (Sheraz) Iftikhar (CRD# 4673210) in addition to the information contained in the Arch Global Advisors, LLC (“Arch Global Advisors” or the “Advisor”, CRD# 297397) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Arch Global Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (212) 991-8807 or by email at [info@archga.com](mailto:info@archga.com).

Additional information about Mr. Iftikhar is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4673210.

## Item 2 – Educational Background and Business Experience

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Sardar (Sheraz) Iftikhar, born in 1978, is dedicated to advising Clients of Arch Global Advisors as a Managing Partner. Mr. Iftikhar earned a Bachelor of Arts from Hunter College in 2003. Additional information regarding Mr.

### Recent Employment History:

Managing Partner, Arch Global Advisors, LLC	07/2018 to Present
Registered Representative, Cambridge Investment Research Inc.	07/2018 to Present
Financial Advisor, Voya Financial Advisors, Inc.	07/2007 to 07/2018

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. However, we do encourage you to independently view the background of Mr. Iftikhar on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4673210.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Iftikhar is also a registered representative of Cambridge Investment Research Inc. (“Cambridge”). Cambridge is a registered broker-dealer (CRD# 39543), member FINRA, SIPC. In Mr. Iftikhar’s separate capacity as a registered representative, Mr. Iftikhar will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Iftikhar. Neither the Advisor nor Mr. Iftikhar will earn any investment advisory fees in connection with any products or services implemented in Mr. Iftikhar’s separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Iftikhar is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Iftikhar’s role with Arch Global Advisors. As an insurance professional, Mr. Iftikhar may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Iftikhar is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Iftikhar or the Advisor.

Mr. Iftikhar has purchased warrants in Lion Street a general insurance company, which offers him the right to buy stock in an insurance company in the future. Clients are under no obligation to implement insurance recommendations through Lion Street.

## Item 5 – Additional Compensation

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Mr. Iftikhar has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Iftikhar serves as a Managing Partner of Arch Global Advisors and is supervised by Akhil Kumar, the Chief Compliance Officer. Mr. Kumar can be reached at (212) 991-8807.

Arch Global Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Arch Global Advisors. Further, Arch Global Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Arch Global Advisors and its Supervised Persons. As a registered entity, Arch Global Advisors is subject to

examinations by regulators, which may be announced or unannounced. Arch Global Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Jonathan R. Wiley**  
**Investment Advisor Representative**

**Effective: December 20, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jonathan R. Wiley (CRD# 5460021) in addition to the information contained in the Arch Global Advisors, LLC (“Arch Global Advisors” or the “Advisor”, CRD# 297397) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Arch Global Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (212) 991-8807 or by email at [info@archga.com](mailto:info@archga.com).

Additional information about Mr. Wiley is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5460021.

## Item 2 – Educational Background and Business Experience

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Jonathan R. Wiley, born in 1985, is dedicated to advising Clients of Arch Global Advisors as an Investment Advisor Representative. Mr. Wiley earned a Masters in Business Administration from New York University - Stern School of Business in 2016. Mr. Wiley also earned a Bachelor of Science in Finance from Montana State University-Billings in 2007. Additional information regarding Mr. Wiley's employment history is included below.

### Employment History:

Investment Advisor Representative, Arch Global Advisors, LLC	07/2018 to Present
Registered Representative, Cambridge Investment Research Inc	08/2019 to Present
Financial Advisor, Voya Financial Advisors, Inc.	10/2015 to 03/2018
Investment Advisor Representative, National Securities Corp.	12/2007 to 10/2015

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. In March 2018, Mr. Wiley was terminated by Voya Financial Advisors due to allegations of unapproved discretionary trading. In December 2018 FINRA closed the file pertaining to this matter. We encourage you to independently view the background of Mr. Wiley on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5460021.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Wiley is also a registered representative of Cambridge Investment Research Inc. ("Cambridge"). Cambridge is a registered broker-dealer (CRD# 39543), member FINRA, SIPC. In Mr. Wiley's separate capacity as a registered representative, Mr. Wiley will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Wiley. Neither the Advisor nor Mr. Wiley will earn any investment advisory fees in connection with any products or services implemented in Mr. Wiley's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Wiley is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Wiley's role with Arch Global Advisors. As an insurance professional, Mr. Wiley may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Wiley is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Wiley or the Advisor.

## Item 5 – Additional Compensation

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Mr. Wiley has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Wiley serves as an Investment Advisor Representative of Arch Global Advisors and is supervised by Akhil Kumar, the Chief Compliance Officer. Mr. Kumar can be reached at (212) 991-8807.

Arch Global Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Arch Global Advisors. Further, Arch Global Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Arch Global Advisors and its Supervised Persons. As a registered entity, Arch Global Advisors is subject to



examinations by regulators, which may be announced or unannounced. Arch Global Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## Privacy Policy

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Effective: December 20, 2019

### Our Commitment to You

Arch Global Advisors, LLC ("Arch Global Advisors" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Arch Global Advisors (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Arch Global Advisors does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Arch Global Advisors shares Client information with Cambridge Investment Research Inc. ("Cambridge"). This sharing is due to the oversight Cambridge has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the Cambridge Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Arch Global Advisors does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Arch Global Advisors or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Arch Global Advisors does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (212) 991-8807 or via email at [info@archga.com](mailto:info@archga.com).