

# Veracity Capital LLC

## Wrap Fee Program Brochure

*This wrap fee program brochure provides information about the qualifications and business practices of Veracity Capital LLC. If you have any questions about the contents of this brochure, please contact us at (844) 508-7884 or by email at: [info@veracitycapital.com](mailto:info@veracitycapital.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Veracity Capital LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Veracity Capital LLC's CRD number is: 304272.*

5001 Spring Valley Road Suite 1130E  
Dallas, TX 75244  
(844) 508-7884  
<https://www.veracitycapital.com>  
[info@veracitycapital.com](mailto:info@veracitycapital.com)

*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 7/02/2019

## **Item 2: Material Changes**

Veracity Capital LLC has not yet filed an annual updating amendment to this Wrap Fee Program Brochure. Therefore, there are no material changes to this brochure to report.

### Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes .....	1
Item 3: Table of Contents .....	2
Item 4: Services, Fees, and Compensation .....	3
Item 5: Types of Clients.....	5
Item 6: Portfolio Manager Selection and Evaluation.....	5
Item 7: Client Information Provided to Portfolio Managers.....	6
Item 8: Client Contact with Portfolio Managers .....	6
Item 9: Additional Information .....	6

## **Item 4: Services, Fees, and Compensation**

### **A. Services**

Veracity Capital, LLC (“Veracity” or the “Advisor”) provides customized investment management and related advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the Veracity Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Veracity as your investment advisor.

As part of the investment advisory fee noted in Item 5 of the Disclosure Brochure, Veracity includes normal securities transaction fees and a platform fee as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees and a platform fee into the single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the Veracity Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Veracity’s investment philosophy and related services.

### **B. Program Costs**

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client’s account, the adviser’s ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

### **C. Fees**

Your IAR will discuss the investment advisory fees when your account is established, and these fees will be outlined in your advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior billing period and are billed at an annual rate of up to 1.50% depending on level of assets being managed, the complexity of the services to be provided and/or the overall relationship with the Client. In addition to the investment advisory fee, the Client shall pay a platform fee of up to 0.40% annually. The platform fee is for securities transaction fees, reporting and related services. A portion of this fee may be retained by Veracity.

Fees are paid either monthly or quarterly, in advance of each calendar month or quarter (the billing period) or in arrears, pursuant to the terms of the investment advisory agreement. Fees for the first partial billing period of service are prorated from the inception date of the account(s) to the end of the first billing period. Fees may be negotiable at the sole discretion of the Advisor. Certain Clients may have a fixed annual fee or fixed rate fee or a fee schedule that differs from above. The Client’s fees will take into consideration the aggregate assets under management with

Advisor. All securities held in accounts managed by Veracity will be independently valued by the Custodian. Veracity will not have the authority or responsibility to value portfolio securities. Please see the Veracity Wrap Fee Program Brochure and your advisory agreement for additional information relative to fees and fee billing.

The Client may make additions or withdrawals from the account(s) at any time, subject to Veracity's right to terminate an account or the overall relationship. Additions may be in cash or securities provided that the Advisor reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account(s). Clients may withdraw account assets on notice to Veracity, subject to the usual and customary securities settlement procedures. However, Veracity typically designs its investment portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. Veracity may consult the Client about the implications of such transactions. Clients are advised that when such securities are liquidated, they may be subject to securities transaction fees, short-term redemption fees, and/or tax ramifications. If assets in excess of \$10,000 are deposited into or withdrawn from the Client's account(s), an adjustment will be made in the next billing period to reflect the fee difference. Veracity may negotiate a fee that differs from the schedule above for certain account(s) or holdings.

As noted above, the Wrap Fee Program includes normal securities trading costs incurred in connection with the discretionary investment management services provided by Veracity. Securities transaction fees for Client-directed trades may be charged back to the Client.

In addition, all fees paid to Veracity for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds 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. The Client may also incur other costs assessed by the Custodian or other parties for account related activity fees, such as wire transfer fees, trade away fees and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund(s) and the fees charged by Veracity to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **D. Compensation**

Veracity is the sponsor and portfolio manager of this Wrap Fee Program. Veracity receives an investment advisory fee paid by Clients for investment advisory services covered under this Wrap Fee Program.

## **Item 5: Types of Clients**

Veracity offers investment advisory services to individuals, families, trusts, estates, and businesses, with a focus on high net worth clients. Veracity generally does not impose a minimum size for establishing a relationship. However, certain investments and strategies may require certain minimums for effective implementation. Please see Item 7– Types of Clients in the Disclosure Brochure for additional information.

## **Item 6: Portfolio Manager Selection and Evaluation**

### **A. Portfolio Manager Selection**

Veracity serves as the sponsor and portfolio manager for this Wrap Fee Program. Advisory services are detailed in Item 4 of the Disclosure Brochure.

### **B. Related Persons**

Veracity's Supervised Persons serve as portfolio managers for services under this Wrap Fee Program. Veracity does not act as portfolio manager for any third-party wrap fee programs.

### **C. Supervised Persons**

As noted above, Supervised Persons serve as a portfolio manager for the Wrap Fee Program. Please refer to the complete Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the services provided by Veracity and the Brochure Supplement for the background of the Supervised Persons of Veracity.

### **D. Performance-Based Fees**

Veracity does not charge performance-based fees for its investment advisory services. The fees charged by Veracity are as described in "Item 5 – Fees and Compensation" above. Veracity 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 or direct any particular investment options to its Clients.

### **E. Methods of Analysis**

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

### **F. 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. Veracity 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.

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(s). 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 the 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.

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. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

#### **G. Voting Client Securities**

Veracity 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 7: Client Information Provided to Portfolio Managers**

Veracity is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the Veracity Privacy Policy (included after this Wrap Fee Program Brochure).

### **Item 8: Client Contact with Portfolio Managers**

Veracity is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Veracity.

### **Item 9: Additional Information**

#### **A. Disciplinary Information**

Veracity 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 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# 304272. Please see Item 9 of the Veracity Disclosure Brochure as well as Item 3 of each IAR's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its IARs.

## **B. Other Financial Activities and Affiliations**

Please see Items 10 and 14 of the Veracity Disclosure Brochure as well as Items 4 and 5 of each IAR's Brochure Supplement (included with this Wrap Fee Program Brochure).

## **C. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

Veracity has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Veracity's compliance program (our "Supervised Persons"). Complete details on the Veracity Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

## **D. Review of Accounts**

Investments in Client accounts are monitored on a regular basis by IARs of Veracity and periodically by its CCO. Please see Item 13 of the Disclosure Brochure (included with this Wrap Fee Program Brochure).

## **E. Other Compensation**

Where Veracity does not exercise discretion over the selection of the Custodian, it may recommend the Custodian(s) to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by Veracity. As its IARs are also registered representatives of Compass, Veracity and its IARs are limited in the custodian(s) in which they can recommend to Clients. Typically, Veracity will recommend that Clients establish their account(s) with Fidelity Clearing & Custody Solutions, a related entity of Fidelity Investments, Inc. (collectively "Fidelity"), where the Advisor maintains an institutional relationship.

Veracity has an established institutional relationship with Fidelity to assist the Advisor in managing Client account(s). The Advisor receives access to software and related support as part of its relationship with Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. 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 the Custodian over one that does not furnish similar software, systems support, or services.

Please see Item 14 - Other Compensation - in the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by Veracity. The Brochure Supplements for each IAR (also included with this Wrap Fee Program Brochure) provide details on outside business activities and the associated compensation, for all Supervised Person(s) with Veracity.



## **F. Financial Information**

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

## **G. Privacy Policy**

Effective Date: November 15, 2018

## **H. Our Commitment to You**

Veracity Capital, LLC (“Veracity” 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. Veracity (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.

Veracity 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.

## **I. Why we 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?**

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. As certain IARs of Veracity are also registered representatives of Compass Securities Corporation ("Compass"), Compass will have access to your information for supervision purposes, even if you do not have accounts established with Compass.	Yes	No
<b>Marketing Purposes</b> Veracity 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 Veracity or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	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> Veracity 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 (844) 508-7884.