

**Part 2A of Form ADV: Firm Brochure**  
**Item 1 Cover Page**

**Assetbridge Investment Management, LLC**  
**Ploutarchou 8, Suite 401**  
**Nicosia, Cyprus, 2406**  
[www.assetbridgeinvest.com](http://www.assetbridgeinvest.com)

This brochure provides information about the qualifications and business practices of Assetbridge Investment Management, LLC. If you have any questions about the contents of this brochure, please contact our firm by calling 917-637-0031 (US) or +357-99-644279 (CY) and/or emailing [investors@assetbridgeinvest.com](mailto:investors@assetbridgeinvest.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. Additional information about Assetbridge Investment Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is **306488**.

Assetbridge Investment Management, LLC's registration as an investment adviser does not imply a certain level of skill or training.

Effective Date: November 11, 2019

## **Item 2 Material Changes**

Last Annual Update: N/A

### **Summary of Material Changes**

This section will be updated as required in the event any material changes are made to the Assetbridge Investment Management, LLC Firm Brochure (the “Brochure”):

- Assetbridge Investment Management, LLC is a new investment advisory firm, so there are no material changes to report at this time.

### **Delivery Requirements**

We will provide a summary of any material changes to this Brochure to our clients at least annually, within 120 days of our fiscal year end. Furthermore, we will provide our clients with other interim disclosures about material changes as necessary.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us by telephone at +1-917-637-0031(US) or +357-99-644279 (CY) and/or [investors@assetbridgeinvest.com](mailto:investors@assetbridgeinvest.com).

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## Item 4 Advisory Business

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### FIRM DESCRIPTION

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Assetbridge Investment Management, LLC (hereinafter referred to as “Assetbridge”, “we”, “us”, or “our firm”) is a New Jersey limited liability company with its principal office located in Nicosia, Cyprus. The principal owner of the firm is Theo Costeas who also serves as Managing Member and Chief Compliance Officer.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

As of November 11, 2019, Assetbridge manages \$9,895,757USD of client assets on a discretionary basis. We generally do not manage any client assets on a non-discretionary basis.

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### ADVISORY PROGRAMS

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Assetbridge provides investment management services to our clients. In connection with our investment management services, Assetbridge provides advice with respect to a broad range of assets: equities, corporate bonds, mutual funds, US treasuries, municipal securities, limited partnerships, and certificates of deposits. We also invest in options to hedge against risks. Our advice is generally limited to these types of investments, but we reserve the right to advise or not advise our clients on certain investments should we deem it appropriate based on their particular circumstances.

Assetbridge’s advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerance, cash or income needs, and any investment restrictions. Although Assetbridge seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firm’s investment philosophy or that may have an adverse effect on our ability to manage your account.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client’s investment guidelines, we will maintain at least annual contact with our clients in terms of portfolio construction, transactions and performance.

Assetbridge enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Investment Management Agreement”). The Investment Management Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services. The Investment

Management Agreement may be terminated by either party in writing at any time by giving thirty (30) days signed written notice to the other party.

**Important Note:** It is the client's responsibility to ensure that Assetbridge is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

## Item 5 Fees and Compensation

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### ADVISORY FEES

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The following information describes how Assetbridge is compensated for the advisory services we provide to our clients. Assetbridge reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. Assetbridge has the general discretion to waive all or a portion of our fees, but typically only exercises this discretion for our employees.

**Investment Management Fees.** In consideration for providing investment management services, Assetbridge receives compensation from our clients based on a specified percentage of as a percentage of Net Liquidation Value entered as an annualized percentage, applied on a monthly basis, in areas. Generally, our advisory fees range from 0.75% to 2.00% of net liquidation value, as illustrated by the fee schedule below:

Fee Schedule	
Net Liquidation Value	Annual Fee %
\$100,000 – 500,000	1.25%
\$500,000 – 1,000,000	1.00%
Above \$1,000,000	0.75%
Certain Non-US clients	2%

**Additional Fees and Expenses.** Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or qualified custodian through which account transactions are executed. For more information on our brokerage practices, please refer to Item 12 (Brokerage Practices) of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund's prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm and others.

**Termination.** The Investment Management Agreement with our clients may be terminated by either party at any time upon thirty (30) days written notice. Upon termination of our status as the client's investment adviser, Assetbridge will not take any further action with respect to the client's account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

**Refunds.** Upon receipt of a proper notice of termination from the client, as described in the Investment Management Agreement, we will calculate a pro-rata refund for the unearned portion (if any) of the fee. For clients that pay in arrears, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

**Brokerage Commissions.** Assetbridge does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

Any material conflicts of interest between clients and Assetbridge or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, Assetbridge will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

## **Item 6 Performance-Based Fees**

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### **PERFORMANCE BASED FEES**

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Assetbridge does not charge performance-based fees.

## **Item 7 Types of Clients**

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### **TYPES OF CLIENTS**

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Assetbridge offers investment advisory services to a diversified group of clients including individuals, individuals with high net worth, corporations or other business entities. Client relationships may vary in scope and length of service.

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### **ACCOUNT REQUIREMENTS**

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Assetbridge generally requires a minimum account balance of \$100,000 for our investment management services. However, Assetbridge in its sole discretion may waive or lower our minimum account balance requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

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

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## METHODS OF ANALYSIS

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Assetbridge employs quantitative and portfolio optimization methods along with fundamental analysis for security selection of stocks and bonds.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

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## INVESTMENT STRATEGIES

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**Modern Portfolio Theory (“MPT”).** The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increase in expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities. Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or in opposition to one another.

### Investment Strategies

Based on the principles of Modern Portfolio Theory and based on Clients’ investment objectives and risk tolerance, Assetbridge will employ three types of strategies. The portfolios will follow the lower risk income strategy, risk neutral multi-asset income strategy, and risk positive multi-asset income strategy. Risk is measured by the amount of volatility these portfolios exhibited, using historical returns as a proxy of the underlying asset classes utilized in their construction. Generally, the higher the volatility, the riskier the investment. The generation of income as generated by bond coupons, share dividends, or to a lesser degree through covered option strategies, is foremost in each strategy.

#### A. Lower Risk Income Strategy

The Lower Risk Income Strategy invests mainly bonds including money market securities, government and corporate bonds. The strategy will take advantage of a global opportunity set, focusing on sectors that may provide an incremental yield advantage over money market rates.

These sectors include primarily investment grade securities but may also incorporate a smaller allocation in high yield, emerging market bonds, preference shares, funds, ETFs and equities. Assetbridge will have the flexibility to adjust the strategy's sector weightings in response to changing market and economic conditions. This dynamic approach can allow the manager to both be defensive and take advantage of compelling income opportunities across regions and credit qualities. The manager will aim to maintain a moderation in duration exposure to reduce the overall interest rate risk of the strategy.

## **B. Risk Neutral Multi-Asset Income Strategy**

The Strategy seeks to maximize the return on the clients' portfolios through a combination of capital growth and income on the Strategy's assets over the long term commensurate with a conservative level of risk. The Fund has a flexible approach to asset allocation and will seek to diversify its exposure across a variety of asset classes globally. The Fund will seek to achieve its investment objective by investing between 60% and 90% of its assets in fixed income securities consisting primarily of investment grade bonds but may also incorporate a smaller allocation in high yield, emerging market bonds and preference shares. Between 10% and 40% of the Strategy's assets will be invested in equity securities or in other funds, including ETFs, incorporating certain covered call strategies to enhance income. The Strategy will seek to diversify its exposure across a variety of asset classes, including equity, fixed income (FI), money market instruments (MMIs) (e.g. debt instruments with short-term maturities). Generally, the Strategy will seek to be positioned such that the portfolios' risk as measured by its annualized volatility over a rolling 5 year period falls within the range of 4%-8%. However, the Strategy's risk profile may fall outside the stated range from time to time.

## **C. Risk Positive Multi-Asset Income Strategy**

The Strategy seeks to maximize the return on the clients' portfolios through a combination of capital growth and income on the Strategy's assets over the long term commensurate with a moderate level of risk. The Fund has a flexible approach to asset allocation and will seek to diversify its exposure across a variety of asset classes globally. The Fund will seek to achieve its investment objective by investing between 40% and 75% of its assets in fixed income securities consisting primarily of investment grade bonds but may also incorporate a smaller allocation in high yield, emerging market bonds and preference shares. Between 25% and 60% of the Strategy's assets will be invested in equity securities or in other funds, including ETFs incorporating certain covered call strategies to enhance income. The Strategy will seek to diversify their exposure across a variety of asset classes, including equity, fixed income (FI), money market instruments (MMIs) (e.g. debt instruments with short-term maturities). Generally, the Strategy will seek to be positioned such that the portfolios' risk as measured by annualized volatility over a rolling 5-year period falls within the range of 6%-12%. However, the Strategy's risk profile may fall outside the stated range from time to time.

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## **RISK OF LOSS**

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Any investment carries a certain degree of risk, including a possible loss of principal that clients should be prepared to bear. The value of securities used in all of our strategies may go up or down



in response to factors not within our control, such as but not limited to the status of an individual company underlying a security, or the general economic climate. There is no guarantee that any of the investment strategies that our firm employs will outperform the investment strategies used by other firms. Past performance is no guarantee of future results.

**Equities.** Equity, such as common stocks, represents ownership interest of the issuer. Equities can decline in value over short or extended periods as a result of changes in a company's financial condition, changes in the overall market, and economic and political conditions. Political risk may be of higher concern for foreign equities. Adverse changes in exchange rates may also lower returns on foreign equities.

**Fixed Income.** Fixed income securities pay a predetermined amount of cash by the issuer to the security holder. A risk associated with fixed income is that the issuer may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater is the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. The amount of decrease is more pronounced for higher duration fixed-income (i.e. those making payments farther in the future). Higher duration fixed-income will also typically exhibit higher price volatility. A nominal interest rate is the sum of a real interest rate and an expected inflation rate, and as such, for fixed real rates, rising inflation may lower the value of fixed income securities in addition to eroding the purchasing power of the fixed payments.

**Municipal Securities.** Municipal securities can be significantly affected by political or economic changes, as well as uncertainties in the municipal market related to taxation, changes in interest rates, relative lack of information about certain issuers of municipal securities, legislative changes or the rights of municipal security holders. Municipal securities backed by current or anticipated revenues from a specific project or specific assets can be negatively affected by the inability to collect revenues for the project or from the assets.

**Mutual Fund.** Mutual funds are open-ended funds. When you buy a mutual fund, you're pooling your money along with other investors. You put money into a mutual fund by buying units or shares of the fund at its net asset value. As more people invest, the fund issues new units or shares. The investments in a mutual fund are managed by a portfolio manager. The level of risk in a mutual fund depends on what it invests in. Stocks are generally riskier than bonds, so an equity fund tends to be riskier than a fixed income fund. Some specialty mutual funds focus on certain kinds of investments, such as emerging markets, to try to earn a higher return.

**Closed-ended Fund.** Closed-ended funds are collective investment models based on issuing a fixed number of shares which are not redeemable from the fund. Unlike mutual funds, new shares in a closed-end fund are not created by managers to meet demand from investors. Investors buy shares in a closed-ended fund at an exchange and the price of the shares could be above the net asset value (premium) or below net asset value (discount). A lack of investor demand or a poor risk and return profile for the fund can lead to it trading at a discount to its net asset value.

**Options.** Option contracts reach a terminal value depending on the underlying security at an expiration date. There is a risk that the option may have no value at expiration, and the option holder loses the total amount invested. Options may involve certain costs and risks such as liquidity, interest rate, market, credit, and the risk that a position could not be closed when most favorable. Trading halts in the underlying security, or other trading conditions (for example, volatility, liquidity, systems failures) may cause the trading market for an option (or all options) to be unavailable, in which case, the holder or writer of an option would not be able to engage in a closing transaction and an option writer would remain obligated until expiration or assignment. Even if the market is available, there may be situations when options prices will not maintain their customary or anticipated relationships to the prices of the underlying interests and related interests. Disruptions in the markets for the underlying interests could also result in losses for options investors. This is not intended to be an exhaustive presentation of all risks associated with trading options and clients should review the current Options Clearing Corporation (“OCC”) disclosure document “Characteristics and Risks of Standardized Options” and any options risk disclosures provided by the broker-dealer used for client trades.

**Market Risk:** Security prices may decrease due in response to direct and indirect events and market conditions, usually caused by factors independent of the specific attributes of the investment security.

**Inflation Risk:** Rising inflation reduces the purchasing power of the underlying currency, which is the dollar for U.S. based investments. This also applies to foreign investments, which may be denominated in other currencies.

**Liquidity Risk:** Liquidity is the ability to convert an investment into cash. Investment assets are usually more liquid when established markets exist to trade those securities. For instance, U.S. Treasury bills and most equity securities have highly developed markets, while tangible property, such as real estate and precious stones, are less liquid. In case of extreme market activity, we may be unable to liquidate investments in thinly traded and relatively illiquid securities promptly if necessary. Also, sales of thinly traded securities could depress the market value of those securities and reduce the investments’ profitability or increase its losses.

**Private Investment:** Investments in private investments, including debt or equity investments in operating and holding companies, investment funds, joint ventures, royalty streams, commodities, physical assets, and other similar types of investments can be highly illiquid and long-term. A portfolio’s ability to transfer and/or dispose of private investments is expected to be highly restricted. Alliance Advisors Wealth Management may not be able to obtain material information about the private investment that other investors obtain. Private investments are not subject to the same reporting and disclosure requirements as public companies, which may increase Valuation Risk for those investments.

**Systemic Risk:** Our firm relies on the stability of the overall financial system to implement its investment strategy. The security of client assets depends on the solvency of a third-party custodian and brokerage firm, upon which the Firm also relies for prime brokerage and trading services. In the event of a disruption to the custodian’s business or the overall functioning of securities markets,

the Firm may be unable to implement its investment strategy and clients may experience a significant or complete loss of their capital.

**Valuation Risk:** The net asset value of a portfolio as of a particular date may be materially greater than or less than its net asset value that would be determined if a portfolio's investments were to be liquidated as of such date. For example, if a portfolio was required to sell a certain asset or all or a substantial portion of its assets on a particular date, the actual price that a portfolio would realize upon the disposition of such asset or assets could be materially less than the value of such asset or assets as reflected in the net asset value of a portfolio. Volatile market conditions could also cause reduced liquidity in the market for certain assets, which could result in liquidation values that are materially less than the values of such assets as reflected in the net asset value of a portfolio.

*Clients should be aware their investment is not guaranteed and understand that there is a risk of loss of value in their investment.*

## Item 9 Disciplinary Information

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### REQUIRED DISCLOSURES

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Our firm and our management persons have not been involved in any legal or disciplinary events that would have a material adverse effect on the integrity of our management or the services we provide to our clients.

## Item 10 Other Financial Industry Activities and Affiliations

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### OUTSIDE BUSINESS ACTIVITIES

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**Assetbridge AIFLNP V.C.I.C. Ltd (“Assetbridge AIF”).** Assetbridge AIF is a Cyprus-based alternative investment fund (registration pending). Mr. Costeas is the sole owner and manager of Assetbridge AIF where he will dedicate about 5 hours per week to fund management. In the future, Assetbridge may recommend non-US clients to invest in Assetbridge AIF, and therefore a conflict of interest exists due to Mr. Costeas's common control of Assetbridge and Assetbridge AIF. However, under no circumstance will Assetbridge recommend US clients to invest in Assetbridge AIF. Any compensation for Mr. Costeas' roles at Assetbridge AIF will be directly paid to Mr. Costeas, and Assetbridge will not receive any portion of this compensation.

**Byron Alpha Funds plc (“Byron Alpha”).** Byron Alpha is an Irish-based Undertakings Collective Investment in Transferable Securities (UCITS) umbrella fund. Mr. Costeas currently serves as a member of the board at Byron Alpha where he attends 4 meetings a year (12 hours total) related to fund governance. Assetbridge will not recommend clients to invest in Byron Alpha.

**Byron Capital Partners Ltd (“Byron Partners”).** Byron Partners is the Investment Manager of Byron Alpha Funds Plc. Mr. Costeas currently serves as a portfolio manager on a part-time basis at Byron Partners where he spends approximately 2-3 hours a day managing its investments.

**Aretaieio Hospital.** Mr. Costeas currently serves as an independent member of the board at Aretaieio Hospital where he attends weekly meetings (10 hours per month) related to hospital governance.

**Springwell Navigation Limited.** Springwell Navigation Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Springwell Navigation Limited where he dedicates 2 hours per month to the company and its board administration.

**Daluz Marine Limited.** Daluz Marine Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Daluz Marine Limited where he dedicates 2 hours per month to the company and its board administration.

**Lieta Maritime Limited.** Lieta Maritime Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Lieta Maritime Limited where he dedicates 2 hours per month to the company and its board administration.

**Saligna Trading Limited.** Saligna Trading Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Saligna Trading Limited where he dedicates 2 hours per month to the company and its board administration.

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## **AFFILIATED ENTITIES**

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**Assetbridge AIFLNP V.C.I.C. Ltd (“Assetbridge AIF”).** Assetbridge AIF is a Cyprus-based alternative investment fund (registration pending). Mr. Costeas is the sole owner and manager of Assetbridge AIF where he will dedicate about 5 hours per week to fund management. In the future, Assetbridge may recommend non-US clients to invest in Assetbridge AIF, and therefore a conflict of interest exists due to Mr. Costeas’s common control of Assetbridge and Assetbridge AIF. However, under no circumstance will Assetbridge recommend US clients to invest in Assetbridge AIF. Any compensation for Mr. Costeas’ roles at Assetbridge AIF will be directly paid to Mr. Costeas, and Assetbridge will not receive any portion of this compensation.

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## **OTHER INVESTMENT ADVISERS**

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Assetbridge does not have any business relationships with other investment advisers that create a material conflict of interest for our clients.

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

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### **CODE OF ETHICS**

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Assetbridge has adopted a Code of Ethics (the “Code”) that sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Assetbridge and our personnel owes a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm’s access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Clients and prospective clients may request a full copy of our firm’s Code of Ethics by contacting our firm in writing at investor or calling our firm at (917) 637 0031 (US) or +357-99-644279 (CY) and/or [investors@assetbridgeinvest.com](mailto:investors@assetbridgeinvest.com).

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## **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

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### **Principal Transactions**

Section 206 of the Advisers Act regulates principal transactions among an investment adviser and its affiliates, on the one hand, and the clients thereof, on the other hand. The Advisers Act generally requires that, when an investment adviser or its affiliate proposes to purchase a security from, or sell a security to, an advisory client (what is commonly referred to as a “principal transaction”), the adviser must make certain disclosures to the client of the terms of the proposed transaction and obtain the client’s consent.

Assetbridge does not engage in principal transactions.

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## **PERSONAL TRADING**

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Assetbridge maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions. Personal trading activities are continually monitored to reasonably prevent conflicts of interest.

## **Item 12 Brokerage Practices**

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### **SELECTION OF BROKER-DEALERS**

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Securities transactions are generally executed through Interactive Brokers, LLC. (“Interactive Brokers”), member FINRA/SIPC/NYSE. Interactive Brokers maintains custody of our clients’

assets and effects securities transactions for our investment management clients' accounts. Assetbridge is independently owned and operated and is not affiliated with or a related person of Interactive Brokers.

Assetbridge considers a number of factors prior to recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by Interactive Brokers are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

**Research and Other Soft Dollar Benefits.** Interactive Brokers offers products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of our fees from clients' accounts, and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts, including accounts not maintained at Interactive Brokers.

Assetbridge has a soft dollar research arrangement with IB. Under this arrangement, Assetbridge clients pay commissions to Interactive Brokers of up to \$.02 per share on U.S. equity and option transactions. As defined under the Securities Exchange Act of 1934, section 28(e), brokers can use a predetermined portion of client commission dollars to pay research-related costs for clients. Interactive Brokers pays research related expenses on the client's behalf directly to vendors who provide a range of services to Assetbridge including fundamental, technical, and quantitative research as well as portfolio analytics. Assetbridge manages all client portfolios with the help of Interactive Brokers soft dollar research services.

Assetbridge does not participate in any commission-sharing arrangements or receive soft dollar credits. While the benefits we receive from Interactive Brokers do not depend on the amount of brokerage transactions directed to Interactive Brokers, as a fiduciary we are required to disclose that there is an inherent conflict of interest when our firm recommends that clients maintain their assets at Interactive Brokers. These recommendations may be based in part on the benefits we receive from Interactive Brokers, such as the availability of the abovementioned products and services, and not solely on our clients' interest in receiving most favorable execution. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Our firm routinely compares order execution disclosure information at Interactive Brokers to other broker-dealers to ensure that Interactive Brokers remains competitive in providing best execution for our clients' securities transactions. Although the brokerage commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other broker-

dealers, in seeking best execution for our clients our firm strives to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by Interactive Brokers.

**Brokerage for Client Referrals.** Assetbridge does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

**Directed Brokerage.** While Assetbridge may recommend that clients direct transactions through certain broker-dealers, we do not have discretionary authority to determine the broker-dealer to be used for the purchase or sale of securities for client accounts or the commission rates paid to a broker-dealer for client securities transactions.

In rare cases, Assetbridge may utilize other broker-dealers when requested by the client. Clients of Assetbridge must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to effect their transactions through a particular broker-dealer, we require such directions to be in writing.

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## **TRADE AGGREGATION**

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As a matter of policy and practice, Assetbridge does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

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## **TRADE ERRORS**

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From time to time, our firm may make a trade error when servicing a client's account. When this occurs, we will correct the trade as soon as we discover the error. Trading errors will be corrected at no cost to clients. In most cases, we will correct trade errors via our executing broker-dealer's trade error desk. If there is a cost associated with this correction, such cost is borne by Assetbridge and not the client. Note that we do not credit accounts for market losses unrelated to our error.

## **Item 13 Review of Accounts**

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### **ACCOUNT REVIEWS**

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Assetbridge conducts account reviews on at least a quarterly ongoing basis for clients subscribed to our investment management services. The frequency of the review depends upon a variety of factors such as: the client's risk profile, activity in the account, economic and market conditions,

and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Accounts are reviewed in the context of the investment objectives and guidelines of each model portfolio as well as any investment restrictions provided by the client. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. These accounts are reviewed by: Theodoros Costeas, Managing Member.

Formal client review meetings are generally conducted on a regular basis at intervals mutually agreed upon by the advisor and the client, but no less than annually. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

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## **ACCOUNT REPORTS**

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Assetbridge does not provide written reports to clients. However, clients have direct and continuous access to their account information and related documents via the password-protected website of the qualified custodian with which their accounts are held.

## **Item 14 Client Referrals and Other Compensation**

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### **CLIENT REFERRALS**

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Assetbridge does not compensate any third-parties (or "solicitors") to promote the investment advisory services offered by our firm, because the solicitor would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

It is our firm's policy not to compensate clients for referring potential clients to our firm, because the client would be considered a solicitor and would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

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### **OTHER COMPENSATION**

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Assetbridge does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services.

## **Item 15 Custody**

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### **CUSTODY OF CLIENT FUNDS AND SECURITIES**

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Interactive Brokers is the qualified custodian and maintains custody of client funds in separate brokerage account(s) for each client under the client's name. Assetbridge personnel may assist the client in preparing paperwork to open a new brokerage account at Interactive Brokers, but only the client is permitted to authorize, by their signature, the opening of the account. Interactive Brokers sends an account-opening letter to each client at their physical mailing address after the account is approved.

Clients can access daily, monthly and annual account statements as well as daily trade confirmations through a password protected portion of Interactive Brokers' website, [www.interactivebrokers.com](http://www.interactivebrokers.com). Clients should also expect to receive quarterly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian(s) and compare such official custodial statements to any account reports provided by Assetbridge. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their brokerage account online on the Interactive Brokers website at [www.interactivebrokers.com](http://www.interactivebrokers.com).

## **Item 16 Investment Discretion**

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### **DISCRETIONARY AUTHORITY**

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Assetbridge manages client securities portfolios on a discretionary basis. Assetbridge is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Assetbridge the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. This authorization will remain in full force and effect until we receive a written termination notice of the Investment Management Agreement from the client.

Assetbridge does not have discretionary authority to determine what broker-dealer to use or the amount of commissions that are charged by the broker-dealer or custodian.

## **Item 17 Voting Client Securities**

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### **AUTHORITY TO VOTE CLIENT PROXIES**

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Assetbridge does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. The qualified custodian holding clients' assets will send all such proxy documents it receives to the client so that the client may take whatever action the client deems appropriate. Assetbridge does not offer clients any consulting assistance regarding proxy issues.

## Item 18 Financial Information

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### REQUIRED DISCLOSURES

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Assetbridge has no financial commitments that would impair our firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

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

**Assetbridge Investment Management, LLC**  
**Ploutarchou 8, Suite 401**  
**Nicosia, Cyprus, 2406**  
www.assetbridgeinvest.com

This brochure provides information about the qualifications and business practices of Assetbridge Investment Management, LLC. If you have any questions about the contents of this brochure, please contact our firm by calling 917-637-0031 (US) or +357-99-644279 (CY) and/or emailing [investors@assetbridgeinvest.com](mailto:investors@assetbridgeinvest.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. Additional information about Assetbridge Investment Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is **306488**.

Assetbridge Investment Management, LLC's registration as an investment adviser does not imply a certain level of skill or training.

Effective Date: November 11, 2019

**SUPERVISED PERSONS: Theo Costeas**

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**EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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**Name:** Theo Costeas

**Year of Birth:** 1977

**Education:** M.A. in Mathematical Finance, Columbia University; 2004  
B.S. in Finance New York University; 2001

**Experience:** Assetbridge Investment Management, LLC  
Founder & Managing Member  
Jan 2018 – Present

Byron Alpha Funds Plc  
Board Member  
Aug 2016 – Present

Byron Capital Partners Ltd  
Portfolio Manager (Part-time)  
Jan 2017 – Present

Byron Capital Partners Ltd  
Portfolio Manager  
June 2009 – Dec 2016

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**DISCIPLINARY INFORMATION**

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Mr. Costeas has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

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**OTHER BUSINESS ACTIVITIES**

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**Assetbridge AIFLNP V.C.I.C. Ltd (“Assetbridge AIF”).** Assetbridge AIF is a Cyprus-based alternative investment fund (registration pending). Mr. Costeas is the sole owner and manager of Assetbridge AIF where he will dedicate about 5 hours per week to fund management. In the future, Assetbridge may recommend non-US clients to invest in Assetbridge AIF, and therefore a conflict of interest exists due to Mr. Costeas's common control of Assetbridge and Assetbridge AIF. However, under no circumstance will Assetbridge recommend US clients to invest in Assetbridge AIF. Any compensation for Mr. Costeas' roles at Assetbridge AIF will be directly paid to Mr. Costeas, and Assetbridge will not receive any portion of this compensation.

**Byron Alpha Funds Plc (“Byron Alpha”).** Byron Alpha is an Irish-based Undertakings Collective Investment in Transferable Securities (UCITS) umbrella fund. Mr. Costeas currently serves as a member of the board at Byron Alpha where he attends 4 meetings a year (12 hours

total) related to fund governance. Assetbridge will not recommend clients to invest in Byron Alpha.

**Byron Capital Partners Ltd (“Byron Partners”).** Byron Partners is the Investment Manager of Byron Alpha Funds Plc. Mr. Costeas currently serves as a portfolio manager on a part-time basis at Byron Partners where he spends approximately 2-3 hours a day managing its investments.

**Aretaieio Hospital.** Mr. Costeas currently serves as an independent member of the board at Aretaieio Hospital where he attends bi-weekly meetings (10 hours per month) related to hospital governance.

**Springwell Navigation Limited.** Springwell Navigation Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Springwell Navigation Limited where he dedicates 2 hours per month to the company and its board administration.

**Daluz Marine Limited.** Daluz Marine Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Daluz Marine Limited where he dedicates 2 hours per month to the company and its board administration.

**Lieta Maritime Limited.** Lieta Maritime Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Lieta Maritime Limited where he dedicates 2 hours per month to the company and its board administration.

**Saligna Trading Limited.** Saligna Trading Limited is a Cyprus-based treasurer for a shipping holding company. Mr. Costeas serves as a director and member of the board at Saligna Trading Limited where he dedicates 2 hours per month to the company and its board administration.

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## **ADDITIONAL COMPENSATION**

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Mr. Costeas receives additional compensation for his roles at Assetbridge AIF, Byron Alpha, Byron Partners, Aretaieio Hospital, Springwell Navigation Limited, Daluz Marine Limited, Lieta Maritime Limited, and Saligna Trading Limited.

A conflict of interest exists to the extent that our firm recommends investing in Assetbridge AIF where Mr. Costeas is the sole owner and receives additional compensation. Our clients are not obligated to invest in the Assetbridge AIF. Please refer to Item 10 for additional information.

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## **SUPERVISION**

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Mr. Costeas is the sole principal and Chief Compliance Officer (“CCO”) of our firm and as such has no internal supervision placed over him. He is, however, bound by our firm’s Code of Ethics. The CCO may be contacted at 917-631-0031 (US) or +357-99-644279 (CY) and/or [investors@assetbridgeinvest.com](mailto:investors@assetbridgeinvest.com).