

# Belpointe Asset Management LLC

## Investment Adviser Disclosure Brochure

### Part 2 of Form ADV

#### Item 1 - Cover Page

This is the cover page for Belpointe Asset Management's Firm Brochure also known as Part 2 of Form ADV. Our firm's Part 1 of Form ADV is available on the Security and Exchange Commission's Investment Adviser Public Disclosure website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

<b>ABOUT THIS BROCHURE</b>	This Brochure provides information about the qualifications and business practices of Belpointe Asset Management LLC.
<b>Where is this firm located?</b>	Our principal supervisory office is located at 3930 E. Ray Road, suite 155, Phoenix, AZ 85044. Our main headquarters and mailing address is located at: 125 Greenwich Avenue, Greenwich, CT 06830.
<b>Who do I contact if I have questions?</b>	If you have any questions about the contents of this Brochure, please contact Chief Compliance Officer, Kimberley A. Raimondo, Esq., at 480.646.3504 or email us at <a href="mailto:compliance@belpointe.com">compliance@belpointe.com</a> .
<b>What are the limitations of this brochure?</b>	<p>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 Belpointe Asset Management is available on the SEC's website at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.</p> <p>In addition, it should be noted that registration with the SEC does not imply a certain level of skill or training of our firm.</p>
<b>Where can I find additional information about this firm?</b>	The SEC's website <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> also provides information relating to Belpointe Asset Management and information about any persons affiliated with Belpointe Asset Management who are registered or are required to be registered as Investment Advisor Representatives of Belpointe Asset Management.
<b>When did you last update this brochure?</b>	July 15, 2019. Belpointe Asset Management LLC© ("Belpointe") All rights reserved.

## Item 2 - Summary of Material Changes

This item discusses specific material changes to the Belpointe Asset Management disclosure brochure. Pursuant to current SEC Rules, Belpointe Asset Management will ensure that clients receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days of the close of the firm's fiscal year which occurs at the end of the calendar year. Belpointe Asset Management may further provide other ongoing disclosure information about material changes as necessary. Belpointe Asset Management may also provide clients with a new disclosure brochure as necessary based on changes or new information, at any time, without charge.

**Below is a summary of material changes to the following Items in this Brochure** based on information previously provided in our Brochure dated **March 30, 2019**.

Belpointe serves as investment adviser to an Exchange-traded fund: **TACTICAL INCOME ETF; Ticker Symbol: TBND**. Belpointe has a material financial incentive to recommend TBND. A portion of the investment product fees from investment in (TBND) is paid to Belpointe for the investment advisory services it provides to the fund. TBND has a gross expense ratio of approximately 1.71%. Belpointe will receive an annual advisory fee of 0.84% of for its management of TBND. In addition, Collaborative Fund Services, an entity owned by Greg H. Skidmore and Brandon Lacoff provides administrative fund services to TBND. Compensation that Collaborative Fund Services receives is paid directly from fund assets. As such, a portion of the fees for an investment in TBND is paid to Collaborative Funds Services. The fees paid to Collaborative Fund Services are above and beyond the investment advisory fee(s), portfolio management fees, and any program fees paid to Belpointe. **(See Item 11 - Section B for additional information relating to the material conflict of interest this creates)**. Clients may obtain more information about the fees and expenses that apply to TBND by contacting Belpointe. Clients may also obtain more information about TBND by reviewing the relevant prospectus which is publicly available on the EDGAR Database on the SEC's website ([www.sec.gov](http://www.sec.gov)). **Material conflicts of interest related to TBND are disclosed in Item 5, Item 11 and Item 14 in this Brochure.**

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## Item 4 - Advisory Business

A	<b>Who is Belpointe?</b>	Belpointe Asset Management LLC ("Belpointe") offers investment advice on individual securities and portfolios of securities. Our firm was founded in Greenwich, CT February 2007 and is indirectly owned by Gregory H. Skidmore and Brandon Lacoff through a Connecticut Limited Liability Company, Belpointe Financial Holdings, LLC.
B.	<b>What services do you offer?</b>	We provide investment advice to assist with: college savings, retirement savings, retirement planning, income planning, preserving assets and growing assets. The investment advice we provide is on a discretionary basis meaning you give us limited power to buy and sell securities in your account.
C.	<b>Do you customize your services?</b>	Yes. We believe in providing customized investment advice to clients, and Belpointe's Wealth Advisors/Portfolio Managers (Advisor) may have his or her own investment and financial planning styles. Prior to making an investment recommendation or implementing an investment strategy, we work with you to understand your financial needs and risk tolerance.
D	<b>Do you have a program that wraps brokerage and advisory fees into one fee?</b>	Yes. Belpointe sponsors two wrap fee programs: the Tactical Integration Program ("TIP") and the Collaborative Investment Program ("CIP"). To learn more about our wrap fee programs you may request a copy of the TIP or CIP Wrap Fee Program Brochure.
E.	<b>What are your assets under management?</b>	Amount Under Management - Total assets under management are <b>\$1,320,229,249</b> as of March 28, 2019. <b>\$1,320,229,249</b> is advised on a discretionary basis. None of our assets are advised on a non-discretionary basis.

## Item 5 - Fees and Compensation

A.	<b>How is Belpointe compensated?</b>	<p>Fees charged are negotiable and may differ from client to client based upon Investment strategies utilized, the amount of assets under management and the amount of work anticipated in servicing your account(s).</p> <p>Generally speaking we are compensated in one of two ways:</p>
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1.	Assets Under Management ("AUM") Fee	<p>We can charge an annual fee based on the amount of assets we are managing for you. This fee is negotiable, and it is our most common way of being compensated. The maximum AUM Fee that can be charged to you is 2.50%. Typically, your fees will be lower.</p> <p>Detailed Description: Our AUM Fee compensates us for investment advisory, management, and administrative services. Fees are calculated on an annualized percentage of assets under management, assessed quarterly in advance. Pro-rata fees will be assessed in the event the Agreement is executed other than the first day of the new calendar quarter. Advisory fees are based on the value of the portfolio as of the last day of the previous quarter. Quarterly fees are charged on the following cycle: March 31st, June 30th, September 30th, and December 31st. A new client will be charged a prorated fee for the current quarter and then begin the next full quarterly cycle. No AUM Fee adjustment will be made during any quarter for appreciation or depreciation in the value of your assets. No adjustment will be made for partial additions to your existing account(s) which when aggregated, total less than \$10,000 per month. Fees are debited directly from your account.</p>
2.	Hourly Fee	<p>Our maximum hourly fee is \$300.00 per hour. This fee is negotiable and agreed upon in advance of any work that we do for your account(s).</p> <p>Detailed Description: The use of an Hourly Fee is an option that you may elect to use in place of the AUM Fee. It may also be billed in addition to an AUM Fee. In the case of financial planning or other additional work you may deem this as an appropriate billing method. You will be invoiced for services rendered on an hourly basis. Fees are due within 30 days of invoice. Time is accrued in 15-minute intervals.</p>
3.	Financial Planning Fees	Financial Planning Fees may be charged on an hourly or fixed fee basis.

<b>B.</b>	<b>How do we collect fees?</b>	Fees are deducted directly from your account on a quarterly basis.
	<b>What if I don't want fees deducted from my account?</b>	You may pay for your fees by personal check or credit card.

<b>C.</b>	<b>What are other fees that I pay?</b>	You should be aware that there are investment costs beyond the advisory fees you pay to Belpointe. It is important to be aware that in some instances investment costs beyond the advisory fees you pay may benefit Belpointe and certain related persons directly or indirectly and Belpointe may receive certain benefits which creates a material conflict of interest. <b>See Item 5C2, 11, and 14 for more information.</b>
<b>1.</b>	<b>Broker-dealer commissions and Custodian Fees</b>	You pay all brokerage commissions and custodian fees. These commission schedules are subject to change at any time at the discretion of the corresponding Broker or Custodian. Please review Item 12 for more information on our Brokerage Practices.
i.	Schwab Transactional Based Pricing	Electronic Equity Trades: 0-1000 shares are \$19.95 (\$8.95 for clients that elect to receive electronic confirmations). Over 1000 shares there is an additional \$0.015 per share cost. Mutual Funds: 0.10 basis points, \$20 minimum with a \$49 maximum trading cost. Option Trades: \$ 1.50 per contract with a \$ 15.00 minimum Commission Per Contract. Fixed Income: \$3 per bond with a \$39 minimum.
ii.	Schwab Asset Based Pricing	The Asset Based Pricing ("ABP") Service Fee is based on the assets in your account. The ABP Service Fee will be computed for each monthly Billing Period and charged in arrears on a monthly or quarterly basis. Our Schwab ABP starts at 0.20% (is lower in some cases) on an annualized basis. This pricing is used in our Wrap Fee Programs.
iii.	TD Ameritrade Transactional Based Pricing	Electronic Equity Trades: \$6.95. Manual Equity Trades: \$44.99. Option Trades: \$8.00 + 0.75 per contract Mutual Funds: \$17.99. Fixed Income: on a net yield basis.
iv.	TD Ameritrade Asset Based Pricing	The Asset Based Pricing ("ABP") Service Fee is based on the assets in your account. The ABP Service Fee will be computed for each quarterly and charged in arrears on a quarterly basis. Our TD ABP starts at 0.10% on an annualized basis. This pricing is used in our Wrap Fee Programs.
v.	Additional Trading Fees	If a trade is executed by Belpointe with another broker-dealer, you will pay additional compensation to that broker-dealer, which may include markups, markdowns, and dealer profits. Any dealer profit, markup or markdown on principal trades will be separate from and in addition to, and will not reduce or otherwise offset, the program fee for your account.
<b>2.</b>	<b>Investment Product Fees</b>	Additional fees may also include internal fees and charges associated with exchange traded funds ("ETFs"), Mutual Funds or other collective investment vehicles that have various internal fees and expenses utilized in your accounts,

which are paid by such funds and ultimately borne by you, the client. Belpointe has the discretion to change these investment products and these changes will increase or decrease the fees you pay depending on the costs of the investment managers or investment products affected by the change.

It is important to be aware that in some instances investment costs beyond the advisory fees you pay may benefit Belpointe and certain related persons directly or indirectly. Typically, the fees you pay associated with investment products are not paid directly or indirectly to Belpointe or its related persons. As such, a direct investment may be less expensive than an investment made through Belpointe. The following investments will directly or indirectly benefit Belpointe and/or its related persons:

**TACTICAL INCOME ETF.** A portion of the investment product fees from investment in Tactical Income ETF (TBND) is paid to Belpointe for the investment advisory services it provides to the fund. TBND has a gross expense ratio of approximately 1.71%. Belpointe will receive an annual advisory fee of 0.84% of for its management of TBND. In addition, Collaborative Fund Services, an entity owned by Greg H. Skidmore and Brandon Lacoff provides administrative fund services to TBND and receives compensation for the services it provides. Clients may obtain more information about the fees and expenses that apply to TBND should contact Belpointe. Clients may also obtain more information by reviewing the relevant prospectus for TBND which is publicly available on the EDGAR Database on the SEC's website ([www.sec.gov](http://www.sec.gov)). Compensation that Collaborative Fund Services receives is paid directly from fund assets. As such, a portion of the fees for an investment in TBND is paid to Collaborative Funds Services. The fees paid to Collaborative Fund Services are above and beyond the investment advisory fee(s), portfolio management fees, and any program fees paid to Belpointe. **(See Item 11 - Section B for additional information relating to the material conflict of interest this creates).**

**MOPPX.** A portion of the investment product fees that you pay to Mercator International Opportunity Fund (MOPPX) is paid to a related portfolio manager, Herve van Caloen and his related investment adviser, Mercator Investment Management, LLC ("Mercator") for the investment advisory services provided to the fund. MOPPX has a gross expense ratio of approximately 2.20%. Mercator and Herve van Caloen will receive approximately 1.19% for management of MOPPX. In addition, Collaborative Fund Services, an entity owned by Greg H. Skidmore and Brandon Lacoff provides administrative fund services to MOPPX and receives compensation for the services it provides. Clients may obtain more

information about the fees and expenses that apply to MOPPX or the strategies that utilize MOPPX should contact Belpointe. Clients may also obtain more information by reviewing the relevant prospectus for MOPPX which is publicly available on the EDGAR Database on the SEC's website ([www.sec.gov](http://www.sec.gov)). Compensation Collaborative Fund Services receives is paid directly from fund assets. As such, a portion of the fees you pay for an investment in MOPPX is paid to Collaborative Funds Services. The fees paid to Collaborative Fund Services are above and beyond the investment advisory fee(s), portfolio management fees, and any program fees paid to Belpointe. **(See Item 11 - Section B for additional information relating to the material conflict of interest this creates).**

Collaborative Fund Services also provides administrative services to: Innovative Dividend Performers Fund Class A (INDPX); Innovative Dividend Performers Fund Class I (IPDPX); Innovative Preferred Plus Fund Class A (INPPX); and Innovative Preferred Plus I (IPPPX); Tactical Conservative Allocation Fund Class A (TFALX); Tactical Conservative Allocation Fund Class I (TFAZX); Tactical Moderate Allocation Fund Class A (TFAMX); Tactical Moderate Allocation Fund Class I (TFAUX); Tactical Growth Allocation Fund Class A (TFAEX); Tactical Growth Allocation Fund Class I (TFAFX). Additional information relating to each Fund including expenses are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Fees related to the services Collaborative Fund Services provides is paid directly from fund assets. As such, a portion of the fees you pay for an investment in the funds is paid to Collaborative Funds Services. The fees paid to Collaborative Fund Services are above and beyond the investment advisory fee(s), portfolio management fees, and any program fees paid to Belpointe. **(See Item 11 - Section B for additional information relating to the material conflict of interest this creates).**

Certain supervised persons of Belpointe are also employed by Collaborative Fund Services. Collaborative Fund Services receives compensation for the services it provides (ranging between 10-35 basis points). Administrative fees are paid out of fund assets. In some instances, the investment adviser to a fund may pay additional administrative fees directly. Fees related to the services Collaborative Fund Services provides is paid directly from fund assets. As such, a portion of the fees you pay for an investment in funds is paid to Collaborative Funds Services. The fees paid to Collaborative Fund Services are above and beyond the investment advisory fee(s), portfolio management fees, and any program fees that you pay Belpointe. **(See Item 11 - Section B for additional information relating to the material conflict of interest this creates).**

**Belpointe LLC**, a private real estate investment firm, owned and managed by Brandon Lacroff is the sponsor of Belpointe REIT. As such an investment in



Belpointe REIT may benefit Belpointe LLC and Brandon Lacoff. It is important to understand the material conflicts of interest that may exist relating to an investment in Belpointe REIT. It is important to read the prospectus to understand the specific risks, conflicts and fees associated with Belpointe REIT before investing in Belpointe REIT. Additional information is available at [belpointereit.com](http://belpointereit.com) or on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). **(See Item 11 - Section B for additional information relating to the material conflict of interest this creates.)**

**Belpointe REIT.** Fees you pay associated with an investment in Belpointe REIT will indirectly benefit Belpointe REIT Manager, Belpointe LLC, and/or its affiliated companies and Brandon E. Lacoff. Belpointe REIT. Belpointe REIT Manager receives a quarterly asset management fee directly from Belpointe REIT equal to an annualized rate of 0.75%. This management fee benefits Belpointe REIT Manager and Brandon E. Lacoff, who serves as the CEO of Belpointe REIT Manager. Belpointe REIT Manager and/or its affiliates has paid organization and offering expenses on Belpointe REIT's behalf. Belpointe REIT will reimburse Belpointe REIT Manager or its affiliates for the costs and future organization and offering costs it may incur on Belpointe REIT's behalf. Organization and offering expenses are expected to be approximately \$250,000 or approximately 0.50% of gross offering proceeds if maximum offering is reached. The organization and offering expenses will also include all marketing expenses incurred by Belpointe REIT Manager or its affiliates in connection with the Belpointe REIT offering, including, without limitation, fees and travel expenses to attend retail seminars and customary lodging, meals and reasonable entertainment expenses associated therewith. Belpointe REIT will also reimburse Belpointe REIT Manager for out-of-pocket expenses paid to third parties in connection with providing services to Belpointe REIT. In addition, Belpointe REIT will reimburse Belpointe REIT Manager for allocable portion of salaries, benefits and overhead of personnel providing services to Belpointe REIT. Belpointe REIT and/or one or more of its affiliates will also be reimbursed for customary acquisition expenses (including expenses related to potential transactions that are not closed), such as legal fees and expenses, costs of due diligence (including, without limitation, appraisals, surveys, engineering reports and environmental site assessments), travel and communications expenses, accounting fees and expenses and other closing costs and miscellaneous expenses related to the acquisition of real estate. In addition, Belpointe REIT Manager, or an affiliate of Belpointe REIT Manager, will be paid an annual property management oversight fee, to be paid by each property owner, equal to 1% of the revenue generated by the applicable property. **(See Item 11 for additional information relating to the material conflict of interest this creates.)**

		<p>It is important to read the prospectus to understand the specific risks, conflicts and fees associated with Belpointe REIT. Additional information is available at <a href="http://belpointereit.com">belpointereit.com</a> or on the SEC's website at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You may also request a copy of the prospectus directly from your IAR. Neither Belpointe nor its IARs may utilize discretion to invest a Client in Belpointe REIT. Fees you pay for an investment in the Belpointe REIT are above and beyond the investment advisory fee(s), portfolio management fees, and any program fees that you pay Belpointe. As such, an investment in Belpointe REIT directly with the sponsor is less expensive than an investment made through Belpointe. <b>(See Item 11 - Section B for additional information relating to the material conflict of interest this creates).</b></p> <p>Investment in Belpointe REIT may only be made on a non-discretionary basis. Clients should consult their own independent tax and legal advisors prior to making an investment in Belpointe REIT.</p> <p>Clients may elect to exclude any fund, security or investment strategy where a material conflict of interest exists. When a client elects exclusion, it may affect the selected strategy and performance of an account can differ from the performance of other accounts without an election. To the extent a client holds a fund or security in an existing account at the time of making the election, there can be tax consequences as a result of the election. Clients should consult their own tax advisors before making this decision. In addition, there can be a period of time after making the election during which the fund remains in a client's account.</p>
3.	<b>Additional Custodian Fees</b>	Our fee does not cover additional fees a custodian may impose for special services elected by you or Belpointe, including, without limitation: periodic distribution fees, electronic fund and wire transfer fees, certificate delivery fees, and reorganization fees.

D.	<b>Do I have to pay fees in advance of services?</b>	AUM Fees are typically paid one quarter (3 months) in advance. Hourly Fees are paid in arrears.
	<b>How do I get a refund?</b>	Please notify us in writing if you wish to terminate your advisory agreement with us and the date on which you would like it to terminate. We will refund a pro-rata portion of your advisory fees. If we notify you of our wish to terminate our advisory agreement, a pro-rata portion of fees paid in advance will be automatically refunded.

		Refunded fees are typically credited to the account that was originally debited. In certain instances, refunds are issued via check and mailed to you.
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<b>E.</b>	<b>Do you accept compensation for the sale of securities?</b>	Belpointe does not accept compensation for the sale of securities.
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## Item 6 - Performance Based Fees and Side-by-Side Management

	<b>Do you charge clients performance based fees or engage in side-by-side management?</b>	No, Belpointe does not charge you an additional fee based on the performance of your accounts (performance-based fees) or engage in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Belpointe's fees are calculated as described above in Item 5 - Fees and Compensation - and are not charged on the basis of a share of the capital gains upon, or capital appreciation of, the funds in a client's account.
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## Item 7 - Types of Clients

1.	<b>What type of clients do you service?</b>	We serve the investment needs of individual investors, corporations, investment companies and trusts.
2.	<b>Do you have requirements for becoming a client?</b>	We do not have a minimum account size. In some cases we may elect not to take on a client if we determine we are not best suited to meet their investment needs. Also, we may terminate a client relationship if we feel we can no longer meet their investment needs. We try to accommodate a wide range of custodians; however, we may refuse a client who does not use a suggested/recommended custodian.

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

A.	<b>Methods of Analysis and Investment Strategies</b>	<p>The investment advice you receive will be based on the experience and investment style of your Belpointe Advisor. Therefore, it is important to review the Brochure Supplement which provides additional background information on your individual Advisor.</p> <p>The replacement of an investment vehicle may be triggered by performance, a change in management, market outlook or a client's personal financial situation. An analysis of your current financial situation, risk tolerance, and future needs will be used to help determine the best investment vehicles to meet your investment objectives.</p> <p>At our firm, each Advisor may create his or her own unique portfolios for clients and there are no “standard” portfolios. We customize portfolios in this way to meet individual needs. It will be difficult for you to evaluate the past performance of a portfolio being recommended because your portfolio is likely to be different from that of another client’s portfolio. There are model portfolios available for some of our strategies and prospective and existing clients may review these to help them understand a strategy.</p> <p>It is important for you to know that several of our investment advisor representatives make public appearances on TV and publish investment-related content. You should not consider their television appearances or published materials to be investment advice and you should not make changes to your investment strategies based on these opinions. Your personal situation can significantly impact the advice you receive from our investment advisor representatives and it may therefore be different from what they publicly say or write.</p> <p>Portfolio strategies are typically combined and blended in an effort to meet the client’s investment objectives. Strategies will also be changed in an effort to improve them. Below is a description of some of the investment strategies we commonly use to manage client portfolios.</p>
1.	<b>Market Tracker (Formerly Asset Class Beta)</b>	<p>Research has shown that most actively managed portfolios underperform their relative benchmark. Our passively managed Portfolios give investors a diversified portfolio targeted to goals like their estimated date of retirement. Use of index funds or asset class funds reduces the risks associated with actively managed portfolios. Risk can be managed by the asset allocation of the portfolio. See the asset allocation guide for additional information.</p>

2.	<b>Alpha Select</b>	Alpha Select uses technical analysis, quantitative research and fundamental research to select securities. Risk of loss can be increased through exposure to the equity market or decreased by holding more cash. The portfolio will be actively traded and frequently buys and sells securities which may result in higher costs to the portfolio. Attempts to time the market are designed to improve the performance of the portfolio, but are accompanied by the risk of underperformance. The portfolio is not tax efficient. The goal of the portfolio is to outperform the S&P 500. There is no guarantee that this can or will be achieved. This portfolio is concentrated in equities and therefore has a substantial risk of loss.
3.	<b>Tactical (formerly BullFinder)</b>	This strategy seeks to use changes in the price of securities to reduce investment risks and enhance returns over the long term. The fundamental assertion is that market forces are the primary drivers of portfolio performance. This strategy tactically allocates to asset. Risk can be managed by selling asset classes that are in a bearish trend. This strategy's primary risks include: market timing, equity risk, debt risk, commodity risk, currency risk and trading risk.
4.	<b>Options Strategies</b>	Generally multiple strategies are used to protect capital and enhance the returns of a client's investment portfolio. The goal is to improve the probability of a positive return. Options strategies to be used typically include buying of puts to hedge equity risk, writing covered calls for income generation, and buying calls as an equity substitute. Option strategies can also be used to significantly increase risk and this may result in substantial losses. If you select to have options be a part of your portfolio, you should consult your Advisor for clarification on whether they are being used to increase or decrease risk in your portfolio.
5.	<b>Relative Strength, Momentum and Sector Rotation</b>	This strategy seeks to use price momentum to reduce investment risks and enhance returns over the long term. The fundamental assertion is that market and sector forces are the primary drivers of portfolio performance. This strategy tactically allocates to market sectors that demonstrate superior relative performance. Risk can be managed by the asset allocation of the portfolio. This portfolio is concentrated in equities and therefore has a substantial risk of loss. See the asset allocation guide for additional information.
6.	<b>University Style</b>	This strategy was created to give individual investors access to institutional style asset allocation. While it is not possible to replicate all aspects of how endowments invest, Belpointe has developed an expertise in applying these strategies to individual investors. This strategy seeks broad diversification to decrease volatility and to target the funding of specific client needs. This portfolio is concentrated in equities and therefore has a substantial risk of loss. Risk can be managed by the asset allocation of the portfolio. See the asset

		allocation guide for additional information.
<b>7.</b>	<b>Fundamental Strategies</b>	Strategies based on fundamental analysis use a method of evaluating a security in an attempt to measure its intrinsic value, by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts study anything that can affect the security's value, including macroeconomic factors such as the overall economy and industry conditions, and microeconomic factors such as financial conditions and company management. Our fundamental strategies incline domestic, international and global equity strategies.

<b>B.</b>	<b>Material Risks</b>	<p>The strategies used to manage risk in our investment strategies include:</p> <ol style="list-style-type: none"> <li>1. Asset Allocation</li> <li>2. Security Selection</li> <li>3. Trading of Securities</li> </ol> <p>You should be aware of how each investment element can affect your risk of loss.</p>
<b>1.</b>	<b>Asset Allocation</b>	<p>In general, safer portfolios are constructed from large allocations to cash, government and high-grade corporate bonds. Higher risk portfolios have larger allocations to stocks. The asset allocation we recommend will vary depending on your personal investment goals. A general guide to asset allocation is offered below. This is not a guide to our 100% tactical portfolios.</p> <p>The category labeled “Other” below, is used to tactically adjust the overall risk of the portfolio.</p> <p>Example: An Advisor may feel negatively toward the equity markets and choose to allocate that other category to bonds, cash, or other investments.</p>
<b>i.</b>	<b>What is the risk of losing all or some of my investment?</b>	Investing always involves a risk of loss, which you should be prepared to bear. See the asset allocation descriptions below for more information. When investing there is always the risk of losing all of your original investment. A Very Conservative Portfolio has a much lower probability of loss than a Very Aggressive Portfolio or Speculative Portfolio.
<b>ii.</b>	<b>How would a market crash affect my portfolio?</b>	Even a portfolio with an asset allocation that matches your financial goals and risk tolerance can be impacted by rare and improbable market events such as the stock market crash of 1929, “Black Monday” of 1987 or the Financial Crisis of 2008. You should not expect us to predict such market anomalies and

		<p>understand that they may have a tremendously negative impact on the value of traditionally “safe” assets.</p> <p>Example: Prior to the financial crisis of 2008, investment grade bonds from financial institutions were considered safe investments. However, the crisis caused many of these bonds to lose 50% of their value.</p>
a.	<b>Preservation Portfolio</b>	A preservation portfolio is a portfolio managed to preserve capital and generate income as its secondary objective. Preservation Portfolios tend to be invested in a mix of government and high grade corporate fixed income securities with much less volatility than the S&P 500. A preservation portfolio is typically 5% Cash, 50% Bonds, 0% Equities and 45% Other.
b.	Conservative Portfolio	A conservative portfolio is a portfolio managed to generate income as its primary objective and preserve initial capital as its secondary objective. Preservation portfolios tend to be invested in a mix of income-producing securities with much less volatility than the S&P 500. A conservative portfolio is typically 1% Cash, 29% Bonds, 15% Equities and 55% Other.
c.	Moderate Portfolio	A moderate portfolio is a balanced portfolio that has both capital preservation, income and growth as its objectives. Moderate portfolios tend to have volatility less than the S&P 500. A moderate portfolio is typically 1% Cash, 9% Bonds, 30% Stocks and 60% Other.
d.	Growth Portfolio	A growth portfolio is a growth portfolio managed to generate long-term capital gains as its primary objective. Growth portfolios tend to be invested in a mix of securities with potential for long-term capital appreciation with volatility similar to the S&P 500. A growth portfolio is 1% Cash, 20% Bonds, and 50% Stocks and 29% Other.
e.	Aggressive Growth Portfolio	An aggressive growth portfolio is a high growth portfolio managed to generate above market capital gains as its primary objective. Aggressive Growth Portfolios tend to be invested in a mix of securities with potential for capital appreciation with volatility in excess of the S&P 500. Aggressive trading, leverage and shorting may be used in a way that increase investment risk. An aggressive growth portfolio is 1% Cash, 0% Bonds, and 80% Stocks and 19% Other.
f.	Speculative	A speculative portfolio is a high growth portfolio managed to generate excessive capital gains as its primary objective. Speculative Portfolios tend to be invested in a mix of securities with potential for excessive capital appreciation with volatility well in excess of the S&P 500. Aggressive trading, leverage and shorting may be used in a way that creates tremendous investment risk. An aggressive portfolio is 1% Cash, 0% Bonds, and 80% Stocks and 19% Other.

2.	<b>Security Selection</b>	The risk of loss in a portfolio can often be increased or decreased depending on the type of security and the quality of the security. Understanding the types of risks that are present within the various securities we use is important to understanding your risk of loss. Our portfolios typically use multiple asset classes and securities to add diversification. This can make the portfolio harder to understand and each individual security or asset class carries its own risk of loss.
i.	<b>Equity Risks</b>	Equity investments in public equities (stocks), Exchange Traded Products (“ETPs”), Real Estate Investment Trusts (“REITs”), Master Limited Partnerships (“MLPs”), Business Development Corporations (BDCs) and mutual funds are not guaranteed. This includes the possibility of losses due to fluctuations in value, fraud, and withdrawals by other fund shareholders. The prices of equity securities rise and fall daily. These price movements may result from factors affecting individual companies, industries or the securities market as a whole. In addition, the equity market tends to move in cycles which may cause stock prices to fall for short or extended periods of time. Companies with a larger market capitalization are typically less risky than companies with a smaller market capitalization. Domestic stocks are considered less risky than international stocks. When making equity investments you assume greater risks than when you invest in bonds or cash.
ii.	<b>Derivative Risks</b>	<p>In financial markets a derivative instrument is a contract between two parties that specifies conditions (dates, resulting values of the underlying variables, and notional amounts) under which payments, or payoffs, are to be made between the parties.</p> <p>The use of derivatives can result in large losses because of leverage, or borrowing. Therefore, investors could lose large amounts if the price of the underlying asset moves against their contract.</p> <p>The loss due to a derivative investment can be unlimited. The most common derivatives used by our firm are Options.</p>
a.	<b>Option Risks</b>	<p>Investments in option contracts are not guaranteed. Options should be considered riskier than stocks, bonds or cash. You should familiarize yourself with the type of option (i.e., put or call) and strategy your Advisor is contemplating. Transactions in options carry a high degree of risk.</p> <p>Buying an option is subject to the risk of losing the premium and transaction costs. When the option is exercised or expires, the purchaser is responsible for any unpaid premium outstanding at that time. If the purchased options expire worthless, you will suffer a total loss of your investment, which will</p>



		<p>consist of the option premium plus transaction costs.</p> <p>Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will be liable for additional margin to maintain the position if the market moves unfavorably. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obligated to either settle the option in cash or to acquire or deliver the underlying interest. If the option is "covered" by the seller holding a corresponding position in the underlying interest or a future or another option, the risk may be reduced. If the option is not covered, the risk of loss can be unlimited.</p>
iii.	<b>Debt Risks</b>	<p>Investments in debt are not guaranteed. We commonly use debt instruments to provide fixed income for a portfolio. The value of fixed income securities will fluctuate, which means that a portfolio could lose money and an individual security can default causing you to lose all of your original investment. Fixed income should be considered less risky than investments in option contracts or equity, but more risky than cash. Preferred stock and/or high yield fixed income can become as risky as an equity investment.</p> <p>High credit quality fixed income securities (like US Treasuries) are less risky than low credit quality fixed income securities (like junk bonds). Fixed income securities with a longer maturity (bonds that mature in 30 years) are riskier than fixed income securities with a shorter maturity (bonds that mature in 6 months). International bonds are considered more risky than domestic bonds (because of currency risks). Higher yielding investments are typically riskier than low yielding investments. A change in any of these factors can cause your fixed income investment to fall in value and in some circumstances become worthless.</p> <p>Other risks affecting fixed income include elements consistent with other investments such as: a change in economic conditions, fraud by the issuer, currency fluctuations, inflation and a change in the US tax treatment.</p>
iv.	<b>Unregistered Investment Risk</b>	<p>Investments in unregistered investments (also known as limited partnerships, hedge funds, private equity, direct investments or co-investments) carry a significant risk of loss, including total loss of investment. To invest in investments that are unregistered with a financial regulator, a client must be an accredited investor. Unregistered investments tend to have less liquidity than traditional investments. Some require holding periods of 5 to 10 years. They may use significant leverage, which can increase potential gains as well</p>

		as potential losses. Unregistered investments can be difficult to accurately price (mark to market) and value. They may offer less transparency into the underlying investments and do not offer investors the same protection as registered investments. For this reason they carry significant risks, including the risk of fraud. Only sophisticated investors who can bear a loss of investment should invest in unregistered investments.
v.	<b>Commodity and Precious Metal Risks</b>	Investments in Commodities and Precious Metals are not guaranteed. The value of a commodity or precious metal investment will fluctuate greater than an equity investment. You should consider an investment in these asset classes to be more risky than an equity investment. You should expect to see changes in the value of these investments in a range that is greater than an equity investment. If you cannot tolerate drastic changes in value you should not invest in commodities or precious metals.

3.	<b>Trading of Securities</b>	When we buy or sell a security, the trade affects whether you experience a gain or a loss. If your personal situation changes which requires the sale of a security at an inopportune time, this can significantly affect the performance of your investments. Market volatility may impair your judgement and result in poor investment timing. Also, frequent trading or attempting to time the market can increase your risk of loss.
i.	<b>Hedging Risks</b>	<p>Hedging an investment position is done to offset or reduce a potential loss. A hedge can be constructed from many types of financial instruments, including: stocks, exchange-traded funds, insurance, forward contracts, swaps, options, many types of over-the-counter and derivative products, and futures contracts.</p> <p>Because hedging often involves the use of derivatives, the risks associated with those instruments should be considered. Also hedging is not guaranteed to work. There are times when a hedge can multiply losses and it should be understood that hedging may reduce one risk while simultaneously increasing another.</p>
ii.	<b>Leverage Risks</b>	The most obvious risk of leverage is that it multiplies losses. An investor who buys a stock on 50% margin will lose 40% of his money if the stock declines 20%. If leverage is attained through the use of derivatives it may involve a counterparty, either a creditor or a derivative counterparty. If a derivative counterparty fails, unrealized gains on the contract may be jeopardized. (See counterparty risks below)
iii.	<b>Liquidity Risks</b>	Investments can suddenly become illiquid and difficult to trade. Illiquid assets

		can be particularly challenging to value and trade if no buyer or seller of an asset can be found. Our AUM Fees, which are based on values provided to us by your custodian, may be higher or lower than they would normally be for an asset with regular pricing information. Markets that provide liquidity may change at any time, eliminating our ability to buy or sell a specific security. Liquidity cannot be guaranteed and you risk not having the ability to buy or sell an investment when investing.
iv.	<b>Market Timing Risks</b>	We may attempt to time when buying, selling or shorting of public equities. Because it is impossible for us to predict the best time to buy or sell a security, there is a risk that our timing may not result in the best price. There is also the risk that the cost of trading outweighs the benefit of the trading activity. The greater the frequency of trading the greater the market timing risks and therefore day trading is especially risky/speculative. Frequent trading in an effort to anticipate market movements may severely hurt the value of a portfolio as this type of activity is highly speculative.
v.	<b>Selling Short Risks</b>	In finance, short selling (also known as shorting or going short) is the practice of selling assets that have not been purchased beforehand, but which the seller may have borrowed from a third party with the intention of buying identical assets back at a later date to return to that third party. The short seller hopes to profit from a decline in the price of the assets. The short seller will incur a loss if the price of the assets rises, and there is no theoretical limit to the loss that can be incurred by a short seller.
vi.	<b>Tax Risks</b>	A Client should understand that all or a portion of their securities may be sold either at the initiation of or during the course of the management of their assets. Clients are responsible for all tax liabilities arising from such transactions and Clients are encouraged to seek the advice of a qualified tax professional. It is important to notify us if your account requires special handling because of your tax situation.
4.	<b>Counterparty Risk</b>	Investments we recommend or purchase on your behalf will contain various degrees of counterparty risk. Counterparty risk can be described as default risk. In other words, it is the risk that an organization does not pay out on a bond, credit derivative, trade credit insurance or payment protection insurance contract, or other trade or transaction when it is supposed to. While we attempt to manage counterparty risk, it is not something that can be guaranteed. The failure of a counterparty in an investment or transaction will result in a loss in the value of your account.

## Item 9 – Disciplinary Information

	<b>Has your firm or any management personnel of the firm been subject to any legal or disciplinary actions?</b>	No. Belpointe and its management persons have no reportable legal or disciplinary history.
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## Item 10 - Other Financial Industry Activities and Affiliations

<b>A.</b>	<b>Are any of your management persons a registered representative of a broker-dealer?</b>	No.
<b>B.</b>	<b>Are any of your management persons registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor?</b>	No.
<b>C.</b>	<b>Does your firm or management</b>	<b>Yes. Please see Item 10C 1-12 below.</b> In addition, You should be aware that Investment Adviser Representatives may be engaged in other business

	<b>persons have any relationship or arrangement that is material to your advisory business?</b>	activities. Further information regarding such activities may be found in the <u>Part 2B: Brochure Supplement</u> portion of this Brochure. Some of these activities may be deemed a conflict of interest. Investment Adviser Representatives are prohibited from engaging in any practice that could jeopardize or disadvantage a client or a client account(s). Accordingly, each representative is further required to acknowledge and adhere to the policies and procedures mandated within the firm's Code of Ethics (please see Item 11 for further information regarding the Code of Ethics).
<b>1.</b>	<b>Broker-Dealer</b>	No.
<b>2.</b>	<b>Investment Company</b>	Collaborative Investment Series Trust. Gregory Skidmore and Brandon Lacoff are members of the Board of Trustees for Collaborative Investment Series Trust, The Trust is a statutory trust organized under the laws of Delaware and is registered with the Commission as an open-end management investment company. The board makes decisions relating to the funds its oversees. Certain mutual funds and Exchange Traded Funds (ETFs) utilized by Belpointe may be governed by the Collaborative Series Trust Board. Clients may request a list of funds governed by the Collaborative Series Investment Trust Board of Trustees.
<b>3.</b>	<b>Another Investment Adviser</b>	No.
<b>4.</b>	<b>Futures commission merchant, commodity pool operator, or commodity trading advisor</b>	No.
<b>5.</b>	<b>Bank or Thrift</b>	No.
<b>6.</b>	<b>Accountant or accounting firm</b>	Greenwich Accounting & Tax Services, LLC ("GATS"). Brandon Lacoff is one of the owners of GATS. Since Mr. Lacoff has a financial interest in both Belpointe and GATS, there is a financial incentive for Belpointe to recommend you select GATS for your accounting and tax services. You are free to elect a firm other than GATS. Belpointe does not receive compensation from GATS for referring clients.
<b>7.</b>	<b>Lawyer or law firm</b>	Greenwich Legal Associates, LLC ("GLA"). Brandon Lacoff is the owner of GLA. GLA prosecutes security class action lawsuits. We permit GLA to monitor your securities for possible class representation in: security class

		<p>action cases; securities litigation; and fraud and failure to meet corporate governance obligations claims. However, since Mr. Lacoff has a financial interest in Belpointe and GLA, there is a financial incentive for Brandon Lacoff to recommend you select GLA to recover losses and damages in a security you own. Brandon Lacoff and GLA would receive attorney's fees for handling your case. You are free to elect a firm other than GLA to represent the claim and/or you may decline to be a representative or participate in a claim.</p> <p>Advisor's Legal &amp; Compliance, LLC. Brandon Lacoff and Kimberley Raimondo are the owners of Advisor's Legal &amp; Compliance, LLC. Advisor's Legal &amp; Compliance may provide compliance consulting and/or legal services to other investment advisors, private funds, hedge funds, investment companies and/or investment trusts.</p>
8.	<b>Insurance company or agency</b>	<p>Belpointe Insurance, LLC is owned by Gregory Skidmore, Brandon Lacoff, Kimberley Raimondo and Robert Raimondo. Belpointe Specialty Insurance, LLC is owned by Brandon Lacoff, Gregory Skidmore and Tim Davidson. Certain Investment Adviser Representatives are licensed agents with Belpointe Insurance, LLC. Fixed insurance product sales to you will be conducted through Belpointe Insurance and P&amp;C insurance may be offered through Belpointe Specialty Insurance, LLC. The owners of Belpointe Insurance and Belpointe Specialty Insurance receive profits and agents are compensated through payment of commissions. While these individuals endeavor at all times to put the interests of the clients first as part of Belpointe's fiduciary duty, clients should be aware that this practice presents a conflict of interest because individuals providing investment advice on behalf of the firm who are also insurance agents may have an incentive to recommend products to clients for the purpose of generating commissions, rather than solely based on client needs. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any individual affiliated with Belpointe Insurance or Belpointe Specialty Insurance.</p>
9.	<b>Pension Consultant</b>	No.
10.	<b>Real Estate Broker</b>	No.
11.	<b>Sponsor or syndicator of limited partnerships</b>	<p>Belpointe Real Estate Partners is the sponsor of the Belpointe Multifamily Development Fund, I, LP. This is closed to new investors.</p>

12.	<b>Mortgage Broker</b>	No.
D.	<b>Do you recommend or select other investment advisers for your clients and do you receive compensation directly or indirectly from those advisers?</b>	Yes. Belpointe may allow Investment Adviser Representatives to recommend other investment advisers. Belpointe and its representatives receive a portion of the fees you are charged by the unaffiliated adviser. This does not change the fee that you, the Client, pays.

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

A.	<b>Can you briefly describe your code of ethics?</b>	We have various ethical standards, described in our Code of Ethics. The Code of Ethics is intended to reflect fiduciary principles that govern the conduct of our firm and our personnel when providing investment advice.
	<b>Can I get a copy of your Code of Ethics?</b>	Yes, a copy of Belpointe's Code of Ethics is available upon request. You may make the request through your Advisor or by calling (203) 629-3300.
B.	<b>Do you or a related person recommend to clients, or buy or sell for client accounts, securities in which you or a related person has a material financial interest?</b>	<p>Yes. Belpointe recommends clients buy or sell securities in which Belpointe or related person has a material financial interest; and Belpointe has a financial incentive to make such recommendation(s) as additional compensation Belpointe or its related persons receive are above and beyond any fees you pay belpointe in the following securities:</p> <p><b>Belpointe REIT.</b> An investment in Belpointe REIT directly and indirectly benefits the sponsor Belpointe LLC, Brandon Lacoff, and Belpointe REIT Manager and/or its affiliates.</p> <p><b>Tactical Income ETF (TBND).</b> An investment in TBND benefits Belpointe, Gregory Skidmore and Brandon Lacoff. This creates a material conflict of interest</p>

	<p><b>Mercator International Opportunity Fund (MOPPX).</b> An investment in MOPPX benefits Gregory Skidmore, Brandon Laccoff and a related portfolio manager, Herve Van Caloen.</p> <p>In addition, Belpointe has a material financial incentive to use and recommend securities governed by the Collaborative Investment Series Trust, or that utilize Belpointe's affiliated companies such for administrative or legal or consulting services and/or those products or investment strategies that benefit Belpointe or its related persons including: Tactical Income ETF (TBND); Mercator International Opportunity Fund ("MOPPX"); Innovative Dividend Performers Fund Class A (INDPX); Innovative Dividend Performers Fund Class I (IPDPX); Innovative Preferred Plus Fund Class A (INPPX); and Innovative Preferred Plus I (IPPPX); Tactical Conservative Allocation Fund Class A (TFALX); Tactical Conservative Allocation Fund Class I (TFAZX); Tactical Moderate Allocation Fund Class A (TFAMX); Tactical Moderate Allocation Fund Class I (TFAUX); Tactical Growth Allocation Fund Class A (TFAEX); Tactical Growth Allocation Fund Class I (TFAFX) are governed by Collaborative Investment Series Trust and/or utilize Belpointe's affiliated companies for administrative, legal or consulting services. <b>See Item 5 Investment Product Fees that Benefit Belpointe or its Related Persons.</b></p> <p>Belpointe's Code of Ethics requires that Belpointe always put Client interest first and when conflicts cannot be eliminated, disclose all material conflicts of interest to you. The individual Belpointe Investment Advisor Representative (IAR) you engage must always act in your best interest and your IAR should only recommend strategies, investment advisory services that he/she believes are in your best interest and are not required to utilize investment strategies, investment products or securities that directly or indirectly benefit Belpointe or its related persons. You should always discuss any questions or concerns related to specific recommendations you receive with your IAR.</p> <p>Clients can elect to exclude any fund, security or investment strategy where a material conflict of interest exists. When a client elects exclusion, it may affect the selected strategy. As a result, performance of an account can differ from the performance of other accounts without an election. To the extent a client holds a fund or security in an existing account at the time of making the election, there can be tax consequences as a result of the election. Clients should consult their own tax advisors before making this decision. In addition, there can be a period of time after making the election during which the fund remains in a client's account.</p>
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<b>C.</b>	<b>Do you or a related person invest in the same securities that you or a related person recommends to clients?</b>	<p>Yes. Your Adviser, the people we supervise, or our affiliates may take positions in the same securities as you. As a result, there may be times when a conflict of interest arises and it is possible for an investment decision to benefit them more than you. To manage these conflicts we have adopted the following principles governing personal investment activities of the people we supervise:</p> <ul style="list-style-type: none"> <li>• The client's' interests will be placed first at all times.</li> <li>• All personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest.</li> <li>• No one may take inappropriate advantage of their positions.</li> </ul>
<b>D.</b>	<b>Do people at your firm recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that he or she buys or sells the same securities for his or her own account?</b>	<p>Yes, your Advisor may take positions in the same securities as you and as a regular course of business your positions may be bought and sold alongside your Advisor. We have imposed policy restrictions on all our personnel with respect to transactions in their own accounts and accounts over which they have control or a beneficial interest. Trading restrictions prohibit unacceptable trading practices such as front running, crossing trades with customers, and insider trading. Our Code of Ethics requires that we comply with applicable Federal securities laws and that we report violations of the Code of Ethics. People we supervise must report their personal transactions and holdings periodically and get preclearance before buying a security in an initial public offering or private offering.</p> <p>When possible, people we supervise must trade alongside you and receive identical pricing. When this is not possible (example: trading at various custodians) the people we supervise must first buy for your accounts and then him/herself. When selling, a supervised person must sell his/her shares after a Client's shares are sold. Even though Belpointe believes that this places the Client in a favorable trading position, this practice may result in Clients receiving worse pricing than access persons due to changes in the market.</p>

## Item 12 - Brokerage Practices

A.	<b>What factors do you consider in selecting or recommending broker-dealers for my transactions and determining the reasonableness of their compensation?</b>	<p>Currently our list of recommended custodians ("Custodians") includes: Charles Schwab &amp; Co., Inc. ("Schwab"), TD Ameritrade, Inc ("TD"), Pershing, LLC ("Pershing") and Trust Company of America ("TCA").</p> <p>In all cases, the recommended Custodian is a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. We believe that each recommended Custodian provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the Custodian, including the value of the Custodian's reputation, execution capabilities, commission rates, responsiveness to our clients and our firm and the value of services the Custodian provides to Belpointe. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. This may create a conflict of interest.</p>
1.	<b>Do you receive "Research" and other "soft dollar" benefits from custodians/brokers?</b>	<p>Yes. "Research" Products and services we receive may include economic surveys, data and analyses; financial publications; recommendations, or other information about particular companies and industries (through research reports and otherwise); and other products or services (e.g., computer services and equipment, including the hardware, software and databases) that provides lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Consistent with Section 28(e), brokerage products and services (beyond traditional execution services) consist primarily of computer services and software that permit our firm to effect securities transactions and perform functions incidental to transaction execution. We generally use such products and services in the conduct of our investment decision-making generally, not just for those accounts for which commissions may be considered to have been used to pay for the products or services.</p> <p>The test for determining whether a service, product or benefit obtained from or at the expense of a broker constitutes "research" under this definition is whether the service, product, or benefit assists our firm in investment decision-making for discretionary client accounts. Services, products, or benefits that do not assist in investment decision-making for discretionary client accounts do not qualify as "research." Also, services,</p>

		<p>products or benefits that are used in part for investment decision-making for discretionary client accounts and in part for other purposes (such as accounting, corporate administration, recordkeeping, performance attribution analysis, client reporting, or investment decision-making for the firm's own investment accounts) constitute "research" only to the extent that they are used in investment decision-making for discretionary client accounts.</p> <p>Before placing orders with a particular broker-dealer, we determine that the commissions to be paid are reasonable in relation to the value of all the brokerage and research products and services provided by that broker-dealer. In some cases, the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts charged by another broker-dealer that did not provide research services or products. We do not exclude a broker-dealer from receiving business simply because the broker-dealer does not provide our firm with soft dollar research products and services. However, we may not be willing to pay the same commission to such broker-dealer as we would have paid had the broker-dealer provided such products and services. The products and services we receive from broker-dealers will generally be used in servicing all of our clients' accounts. Our use of these products and services will not be limited to the accounts that paid commissions to the broker-dealer for such products and services. In addition, we may not allocate soft dollar benefits to your accounts proportionately to the soft dollar credits the accounts generate. As part of our fiduciary duties to you, we endeavor at all times to put your interests first. You should be aware that the receipt of economic benefits by our firm is considered to create a conflict of interest.</p> <p>We have instituted certain procedures governing soft dollar relationships including annual evaluation of soft dollar relationships, and an annual review of this Brochure to ensure adequate disclosure of conflicts of interest regarding our soft dollar relationships.</p>
	<b>TD Ameritrade Institutional Program</b>	<p>We participate in the TD Ameritrade Institutional Program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade, Inc., member FINRA/SIPC ("TD Ameritrade"), an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Belpointe receives some benefits from TD Ameritrade through its participation in the Program. <b>(Please see Item 14 below for additional</b></p>

**disclosures relating to the benefits we receive from our participation in this Program and the conflict of interest it creates.)**

Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars." Because many of the services or products could be considered to provide a benefit to us, and because the "soft dollars" used to acquire them are client assets, we could be considered to have a conflict of interest in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation we might otherwise be able to negotiate. In addition, we could have an incentive to cause you to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

Our use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), we will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in our performance of our overall responsibilities to all of our clients. In some cases, commissions or other transaction fees charged by TD Ameritrade for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge.

a.	<b>When you use my brokerage commissions to pay for products or services does it save your firm money?</b>	Yes, when we use your brokerage commissions to obtain research or other products or services as described above, we receive a benefit because we do not have to pay for the research, products or services.
b.	<b>Do you have an incentive to select or recommend a broker-dealer based on your interest in receiving products or services, rather than based on my interest in receiving the most favorable execution?</b>	While we believe that our relationship with all recommended Custodians is in the best interest of our firm's clients and satisfies our client obligations, including our duty to seek best execution, our participation in TD Ameritrade's Program and receipt of soft dollars does create a conflict of interest since there is an incentive for Belpointe to recommend, use or expand the use of TD Ameritrade's services.
c.	<b>Will this cause me to pay commissions higher than those charged by other broker-dealers?</b>	Yes, the commissions or other transaction fees charged for a particular transaction or set of transactions by TD Ameritrade may be higher than those charged by other custodians and broker-dealers.
d.	<b>What types of products and services do you receive from my commission dollars?</b>	<p>As a Registered Investment Adviser, we have access to our recommended custodian's institutional platform. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.</p> <p>Our Custodians provide us with access to their institutional trading and custody services, which are typically not available to retail investors. These services are generally available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10</p>

million of the adviser's clients' assets are maintained in accounts. These services are not contingent upon us committing to any specific amount of trading commissions. Our custodians do not charge separately for custody services but are compensated by your brokerage commissions and other fees.

Our Custodians brokerage services will typically include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Our Custodians offer products and services that assist us in managing and administering your account and the accounts of our other clients. This includes software and other technology that:

1. Provide us access to client account data (such as trade confirmations and account statements)
2. Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
3. Provide research, pricing and other market data
4. Facilitate payment of our fees from clients' accounts
5. Assist with back-office functions, recordkeeping and client reporting

Custodians may also offer other services intended to help us manage and further develop its business enterprise. These services include:

1. Compliance, legal and business consulting
2. Publications and conferences on practice management and business succession
3. Access to employee benefits providers, human capital consultants and insurance providers.
4. Arrange and/or pay third party vendors for the types of services rendered to our firm.
5. Discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to Belpointe.
6. Provide educational events or occasional business entertainment of our personnel.

In evaluating whether to recommend or require that you custody your assets at a particular Custodian, we take into account the availability of some of these products and services. We do not rely solely on the nature,

		cost or quality of custody or brokerage services to you, which creates a conflict of interest.
2.	<b>Do you consider, in selecting or recommending broker-dealers, whether you or a related person receives client referrals from a broker-dealer?</b>	No.
3.	<b>Do you direct brokerage commissions or allow clients to direct brokerage commissions?</b>	No.
a.	<b>Do you routinely recommend, request or require that I execute transactions through a specified broker-dealer?</b>	No.
b.	<b>Am I permitted to direct brokerage to a specific broker-dealer?</b>	<p>Yes. However, If a Client directs Belpointe to use a particular broker, you should be aware of the following:</p> <ol style="list-style-type: none"> <li>1. Our ability to achieve the best sale or purchase price (best execution) may be limited</li> <li>2. We may not be able to negotiate or renegotiate the commission rates with a client's directed broker-dealer</li> <li>3. You will not be able to participate in volume discount commission rates that may be negotiated with our existing broker-dealers</li> <li>4. You may forgo other benefits from savings on execution costs that may otherwise be obtained by aggregating client orders.</li> </ol>
<b>B.</b>	<b>Under what conditions do you aggregate the</b>	We may aggregate transactions for your account(s) with the transactions of other clients. We do this to avoid giving favorable pricing to one client over another.

	<b>purchase or sale of securities for my accounts with other client's accounts?</b>	<p>This practice will not reduce the costs charged to your account for those transactions. Our trading policies require us to assign to your account the average price resulting from these aggregated trades. If a trade order for a large group of clients is not completed, the shares may be allocated in one of three ways:</p> <ol style="list-style-type: none"> <li>1. Randomly</li> <li>2. Pro rata based on the size of the account</li> <li>3. Alphabetically</li> </ol> <p>Our trade allocation policies may result in certain clients paying higher or lower prices for securities than may otherwise have been obtained if the transactions had been executed separately.</p>
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## Item 13 – Review of Accounts

<b>A.</b>	<b>Do you periodically review my accounts?</b>	Yes. Belpointe reviews trades done in your accounts frequently and your account balances daily. Performance reviews are conducted on a periodic basis.
<b>B.</b>	<b>Do you review my accounts on other than a periodic basis?</b>	Review into asset allocation and security selection can be triggered by a number of factors. This may include (but is not limited to) factors such as economic conditions, market conditions, security related factors and a change in a client's financial/investment needs or goals. You may call at any time during normal business hours to speak directly with your Advisor about your account(s), financial situation, or investment needs. You may trigger a review at any time by requesting a review of your account. No formal instruction is provided on how to review client accounts. Advisors are permitted to use their discretion on how and when to review client accounts. You should consult your Advisor on the frequency and method of their reviews.
<b>C.</b>	<b>What is the content and frequency of regular reports you provide me?</b>	<p>Belpointe may provide to you a web portal that is generally updated and reconciled on a daily basis. This site reports the holdings, balances, activity, fees and performance of your Account. At times these updates will be delayed because of technical difficulties that are common with portfolio accounting and data reconciliation.</p> <p>The web portal is available at <a href="http://belpointeasset.com">http://belpointeasset.com</a> or</p>



		<p><a href="http://belpointewealth.com">http://belpointewealth.com</a>. Belpointe's reporting is only available electronically through this portal. Please contact your Investment Adviser Representative if you wish to have access to the web portal. We urge you to compare the electronic reports you receive from us with the reports you receive from your custodian to ensure accuracy.</p> <p>Statements from custodians report at least quarterly describing all activity in the client's account during the preceding month/quarter, including all transactions made on behalf of the account, all contributions and withdrawals made by the client, and all fees and expenses charged to the account. It also includes the value of the account at both the beginning and end of the period.</p>
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## Item 14 - Client Referrals and Other Compensation

A.	<p><b>Are you compensated by anyone other than clients for the advice that you provide to clients?</b></p>	<p>Yes. Belpointe has solicitor agreements with and may recommend clients to certain unaffiliated investment advisers. In such instances, Belpointe acts as a solicitor and receives a portion of the fee paid to the unaffiliated adviser. This does not raise the fee paid by the client and the client receives all required disclosure forms disclosing the terms of the solicitor relationship at the time the solicitation is made.</p> <p>As described more fully in item 5 and item 11, Certain related persons receive additional compensation when Belpointe recommends and you invest in the following:</p> <p><b>Belpointe REIT.</b> Belpointe has a material financial incentive to recommend the Belpointe REIT as an investment in Belpointe REIT may directly and indirectly benefit the sponsor Belpointe LLC, Brandon Lacoff, and Belpointe REIT Manager and/or its affiliates. <b>See Item 5 Investment Product Fees that Benefit Belpointe or its Related Persons and the material conflict of interest this creates described more fully in Item 11.</b> It is important to understand how this impacts you and you should be aware that you may elect to exclude any fund, security or investment strategy where a material conflict of interest exists.</p> <p><b>Tactical Income ETF (TBND).</b> An investment in TBND benefits Belpointe, Gregory Skidmore and Brandon Lacoff. This creates a material conflict of</p>
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	<p>interest</p> <p><b>Mercator International Opportunity Fund (MOPPX).</b> An investment in MOPPX benefits Gregory Skidmore, Brandon Laccoff and a related portfolio manager, Herve Van Caloen.</p> <p>In addition, Belpointe has a material financial incentive to use and recommend securities governed by the Collaborative Investment Series Trust, or that utilize Belpointe's affiliated companies such for administrative or legal or consulting services and/or those products or investment strategies that benefit Belpointe or its related persons, which include: Tactical Income ETF (TBND); Mercator International Opportunity Fund (MOPPX); Innovative Dividend Performers Fund Class A (INDPX); Innovative Dividend Performers Fund Class I (IPDPX) ; Innovative Preferred Plus Fund Class A (INPPX); and Innovative Preferred Plus I (IPPPX); Tactical Conservative Allocation Fund Class A (TFALX); Tactical Conservative Allocation Fund Class I (TFAZX); Tactical Moderate Allocation Fund Class A (TFAMX); Tactical Moderate Allocation Fund Class I (TFAUX); Tactical Growth Allocation Fund Class A (TFAEX); Tactical Growth Allocation Fund Class I (TFAFX). <b>This creates a material conflict of interest which is described more fully in Item 11. It is important to understand how this impacts you and you should be aware that you may elect to exclude any fund, security or investment strategy where a material conflict of interest exists.</b></p> <p>As disclosed under Item 12 above, Belpointe participates in TD Ameritrade's institutional customer program and Belpointe may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Belpointe's participation in the program and the investment advice it gives to its Clients, although Belpointe receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.</p> <p>These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research,</p>
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		<p>technology, and practice management products or services provided to Belpointe by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Belpointe's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Belpointe but may not benefit its Client accounts.</p> <p>These products or services may assist Belpointe in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Belpointe manage and further develop its business enterprise. The benefits received by Belpointe or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.</p> <p>As part of its fiduciary duties to clients, Belpointe endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Belpointe or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Belpointe's choice of TD Ameritrade for custody and brokerage services.</p>
<b>B.</b>	<b>Do you compensate anyone who is outside your firm's supervision for client referrals?</b>	<p>Belpointe retains solicitors to refer clients to Belpointe. If a client is introduced to Belpointe by a solicitor, Belpointe pays that solicitor a referral fee in accordance with the requirements of the Investment Advisers Act and any corresponding state securities law requirements. Any such referral fee shall be paid solely from Belpointe's advisory fee, and shall not result in any additional charge to the client. If the client is introduced to Belpointe by a solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of the solicitor relationship with Belpointe, and shall provide each prospective client with a copy of this ADV 2A Brochure together with a copy of the written disclosure statement disclosing the terms of the solicitation arrangement between Belpointe and the solicitor, including the compensation to be received by the solicitor for the referral.</p>

## Item 15 - Custody

<b>A</b>	<b>Do you have custody of my assets?</b>	<p>When providing investment advisory services, we do not have custody of your assets. A qualified custodian will have custody of your investments and they will send you monthly statements and trade confirmations independently from our</p>
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		reports. The SEC deems us to have custody, but only for the purpose of deducting fees. Certain related persons hold custody relating to Belpointe REIT.
	<b>Who can I use to custody my assets when working with you?</b>	We typically recommend that you custody your assets at Schwab Institutional and TD Ameritrade, Inc. We may work with clients who custody assets at other locations in some circumstances.
	<b>How frequently will they send me a statement of my assets?</b>	Statements from custodians report at least quarterly.
	<b>How do you safeguard my assets?</b>	<p>Our recommended custodians are all members of the Securities Investor Protection Corporation (SIPC), and brokerage accounts maintained with them are protected by SIPC, which protects brokerage accounts of each customer when a brokerage firm is closed due to bankruptcy or other financial difficulties and customer assets are missing from accounts. SIPC protects brokerage accounts of each customer up to \$500,000 in securities, including a limit of \$250,000 on claims for cash. Money market funds held in a brokerage account are considered securities. For more information on SIPC coverage, please review the brochure “How SIPC Protects You” available for free download at <a href="http://www.sipc.org">www.sipc.org</a>.</p> <p>Certain assets are not eligible for SIPC protection. Among the assets typically not eligible for SIPC protection are commodity futures contracts, precious metals, as well as investment contracts (such as limited partnerships) and fixed annuity contracts that are not registered with the U.S. Securities and Exchange Commission under the Securities Act of 1933.</p> <p>In accordance with the SEC rule 15c3-3, often known as the “Customer Protection Rule”, a custodian must protect client securities that are fully paid for by segregating them and ensuring that they are not used for any other purpose, such as for loans to investors or institutions, corporate investment purposes, and spending. This practice helps ensure that customers have access to these securities at all times. Customer assets may still be subject to market risk and volatility.</p> <p>You have the option of using multiple custodians to provide yourself with greater SIPC coverage.</p> <p>In addition, Belpointe carries a employee theft bond that covers \$1,000,000 in the event that theft from a client’s account is carried out by an employee.</p>

## Item 16 - Investment Discretion

<p><b>Do you have investment discretion?</b></p>	<p>Yes. You provide us with limited-powers and authority to manage your accounts using our own discretion. We act as your agent, with respect to your account(s):</p> <ol style="list-style-type: none"> <li>1. To make all investment decisions; and</li> <li>2. To buy, sell and otherwise trade in securities or other related investments.</li> <li>3. Discretion and authority includes the following: Asset Allocation Discretion; Security Selection Discretion; Brokerage Discretion; Proxy Voting Discretion; and Commission Rate Discretion.</li> </ol> <p>You may place reasonable restrictions on your account(s) through the use of written instructions to us ("Client Instructions"). This includes which individual securities to buy or sell. You may place these restrictions in the form of limitations on a specific security or broad categories of securities. You may also choose to have your accounts managed on a non-discretionary manner.</p> <p>Investment Discretion does not authorize the following and therefore we must receive your written approval before: investing in privately offered securities, purchasing insurance contracts, investing in non-registered investments, and opening or closing custodial accounts. Investment in Belpointe REIT will only be permitted on an non-discretionary basis.</p> <p>We do not direct trades to brokerage firms in exchange for research or products.</p>
<p><b>May I have my account managed on a non-discretionary basis?</b></p>	<p>Yes, you may have your account managed on a non-discretionary basis. However, we are not a broker dealer and management of non-discretionary accounts may be different from what you understand them to be or are accustomed to.</p> <p>Therefore, it is important to understand the following:</p> <p>Non-discretionary basis means we will not buy or sell a security without first communicating our investment advice to you and receiving verbal authority to implement our recommendations. Once we have received authority to implement a strategy we may exercise the following discretion:</p> <ol style="list-style-type: none"> <li>1. Power to exercise discretion in the selection of the security to be purchased or sold;</li> <li>2. Power to exercise discretion on time and price;</li> <li>3. Power to exercise discretion on the quantity of shares/amount of a security</li> </ol>

		<p>to be bought or sold;</p> <ol style="list-style-type: none"> <li>4. Power to refuse an order from you to buy or sell a security because it violates our commitment to act in your best interest at all times;</li> <li>5. Power to exercise discretion on the broker to be used and brokerage commission rates to be paid.</li> </ol> <p>Some disadvantages to having your account managed on a non-discretionary basis are:</p> <ol style="list-style-type: none"> <li>1. It is Belpointe's policy to execute trades for discretionary clients before the trades of non-discretionary clients.</li> <li>2. The price you receive for securities purchased or sold will be different from the price you would have received as a discretionary client.</li> <li>3. The advice you receive may be delayed because we cannot reach you, are communicating with other non-discretionary clients, and/or taking action first with our discretionary clients.</li> </ol>
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## Item 17 - Voting Client Securities

A.	<b>How do you handle the voting of proxies?</b>	<p>We have voting authority with regard to your securities and therefore have the authority to vote proxies on your behalf.</p> <p>Our policy is to refrain from voting proxies because we believe the time cost of voting a proxy typically outweighs the benefits to our clients in aggregate. From time-to-time we may elect to vote proxies when we believe the benefit outweighs these costs. This may not always be in your best interest.</p> <p>Through the use of Client Instructions you may place restrictions on our ability to participate in proxy voting.</p>
B.	<b>What if I want to vote proxies and receive other solicitations?</b>	<p>You may elect to receive/vote proxies and receive solicitations. These will be delivered directly by your custodian to you. You will be able to make the elections yourself or ask your Adviser to help you with voting.</p>

## Item 18 - Financial Information

<b>A.</b>	<b>Will you require or solicit prepayment of more than \$1,200 in fees from me, six months or more in advance?</b>	No because Belpointe does not require or solicit prepayment of more than \$1,200 in fees, six months or more in advance, Belpointe is not required to include a balance sheet with this disclosure brochure.
<b>B.</b>	<b>Are you facing any financial condition that is reasonably likely to impair your ability to meet contractual commitments to me?</b>	No.
<b>C.</b>	<b>Have you have been the subject of a bankruptcy petition at any time during the past ten years?</b>	No.

## Item 19 - Requirements for State-Registered Advisers

This section does not apply to our firm.