



PORTFOLIO RE-OPTIMIZATION



Gravity Capital Partners, LLC

Doing Business as

Gravity Investments Inc

& Portfolio ThinkTank

Main Phone. (970) GRAVITY

Direct Line. (970) 295-4001

www.gravityinvestments.com

www.portfolithinktank.com

Date of Brochure: 10/25/2019

This brochure provides information about the qualifications and business practices of Gravity Capital Partners, LLC. ("Gravity"). If you have any questions about the contents of this brochure, please contact us at 970 GRAVITY or info@gravityinvestments.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

"Registration" does not imply a certain level of skill or training.

2

MATERIAL CHANGES

Since the last annual update of this brochure dated 4.5.2019, the following are material changes:

- Assets under management have been updated (Item 4)
- Employee Changes

3 TABLE OF CONTENTS

Item 4. Advisory Business.....	4
Item 5. Fees and Compensation	8
Item 6. Performance-Based Fees and Side-By-Side Management.....	10
Item 7. Types of Clients	11
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss	13
Item 9. Disciplinary History	28
Item 10. Other Financial Industry Activities and Affiliations	29
Item 11 Code of Ethic, Participation or Interest in Client Transactions and Personal Trading.....	30
Item 12. Brokerage Practices	31
Item 14. Client Referrals and Other Compensation	35
Item 15. Custody	35
Item 16. Investment Discretion	35
Item 17. Voting Client Securities	38
Item 18. Financial Information	38
Item 19. State Regulation	39
Other Information	40
Class Actions and Other Legal Proceedings	41
Privacy Notice.....	41
<i>Our Promise to You</i>	41
<i>Information Provided</i>	41
<i>How We Manage and Protect Your Personal Information</i>	41
<i>Client Notifications</i>	42

4

ADVISORY BUSINESS

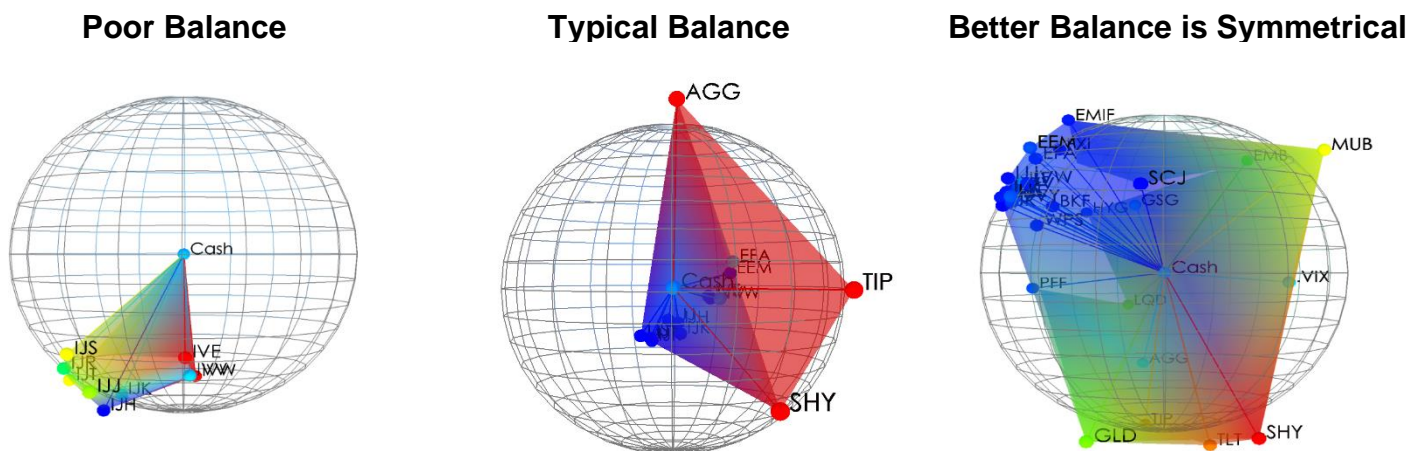
Background

Gravity Capital Partners, LLC (“Gravity”) is a fee-only investment management firm that began in 2010 located in Denver, Colorado. It is a Registered Investment Adviser.

The company is wholly owned by Gravity Investments Inc, a company incorporated in Delaware.

Gravity is an asset management firm specializing in working with Advisors, portfolio managers, and other professionals as a sub advisor to build and maintain custom model portfolios based on our patented logic for True Diversification®. We refer to the investment portfolios produced by this process and meeting our standards as being “Diversification Weighted®.” Such portfolios typically exhibit more diversification and research exhibits that this increase in diversification translates into a material reduction of losses in down markets with some reduction to performance during bull markets. Additionally, we may bundle software tools and platforms with our professional services to help our advisory clients report, educate, understand and evangelize diversification for their own clientele. In designing the portfolios, Gravity uniquely utilizes an affiliated company’s patented software for interactive 3D graphics.

Gravity clients obtain a clear understanding of diversification with our proprietary measurement techniques and visualization. An illustration of the visualization follows below;



A copy of this disclosure document shall be provided to each institution at least 48 hours prior to the execution of any sub advisory agreement executed by any institutional client or Gravity will allow 5 days for cancelation. Prior to engaging with Gravity for investment advisory

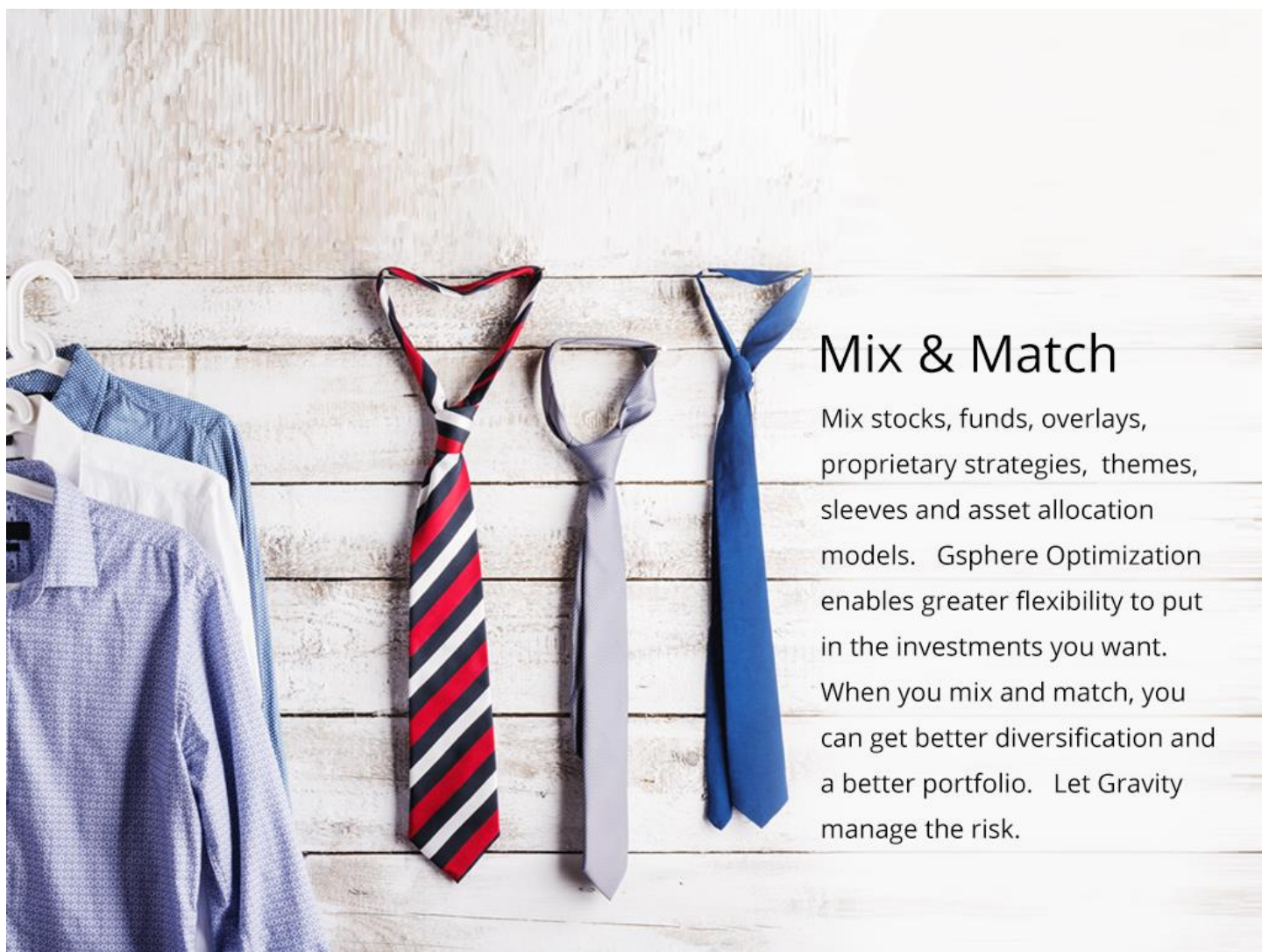
services, the Institutional client will be required to enter a written Agreement with Gravity. The Agreement sets forth the terms and conditions of the engagement and describes the scope of the services to be provided and the fees for such services.

In performing its services, Gravity shall not be required to verify any information received from the advisor or institution. Gravity may recommend and/or engage the services of other professionals for implementation purposes.

Gravity offers investment management and investment supervisory services for a fee based on a percentage of assets under management or administration. These services include security selection, investment analysis, allocation of investments, rebalancing, reoptimization, automation, recommendations and ongoing monitoring services for the portfolio.

Gravity's automated portfolio optimization platform can now fully automate the investment strategies when we connect to the designated custodian or broker. Advisers and institutions are advised and expected to understand that Gravity's past performance is not a guarantee of future results and that certain market and economic risks exist that may adversely affect a model's performance. Neither portfolio automation nor portfolio diversification are likely to protect against a declining market.

We provide portfolio management services on both a discretionary and non-discretionary basis. Each client may designate a custom set of constraints and securities or other processes in concert with the stated objectives of a portfolio. Gravity has authority to manage these portfolios within that framework and allows for periodic revision of such policies.



Gravity acts as a model manager, third party strategist, sub-advisor, co-manager or overlay manager in different scenarios.

Our advice is often tailored around the existing business practices of our clients, typically embracing their processes and support systems for security selection and strategy and combining our expertise in process, optimization and technology.

We are not affiliated with any Broker-Dealer, bank, mutual fund company, insurance company or other institution, nor do we receive any inducements from any broker or investment product company. We do not receive any commissions - ever. This way our incentives are to create and manage the best portfolio strategies for our clients and investors.

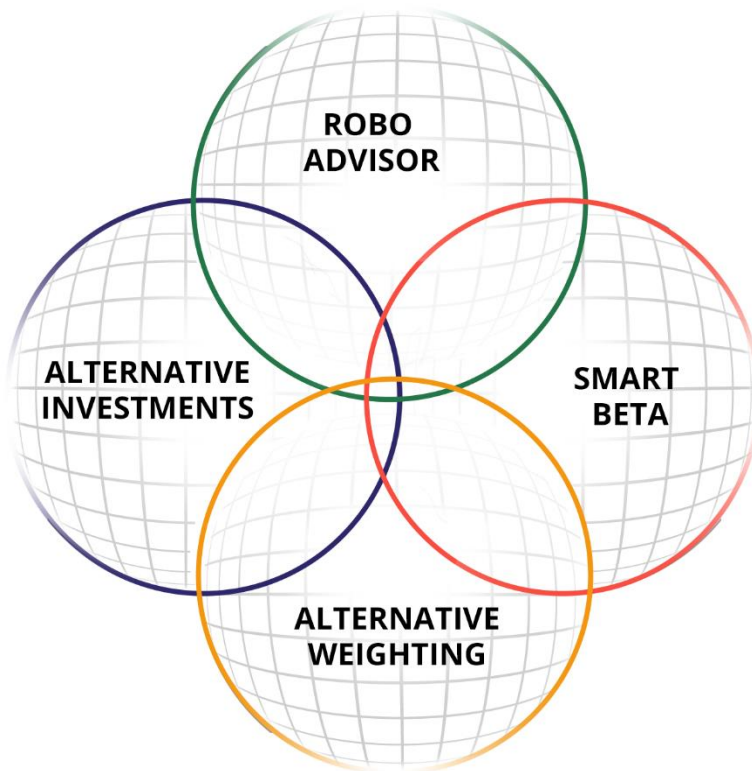
Gravity is paid in the same manner as the client advisor in a manner consistent with their retail practice such as billing fees in advance or in arrears. Hence, our client's respective clientele may terminate at any time.

Discretionary Assets under Management as of October 25, 2019

\$15,534,959

As a sub advisor, typically assets count as regulatory AUM on behave of our clients.

Gravity provides solutions based on our Automated Portfolio Optimization Platform related to the following:



5

Fees and Compensation

Gravity's fee includes compensation for predominantly advisory (both AUM and AUA) and secondarily consulting services provided by Gravity. There is no redemption, exit fees or transaction fees charged by Gravity. Fees may vary based on the size of the client and our assets under sub advisement, number of model portfolios provided, complexity of the portfolios, extent of activity in the account or other reasons agreed upon by Gravity and the advisory client. Gravity may enter into fixed fee consulting work from time to time to perform specific consulting or management consulting projects for larger, non-discretionary advisors and institutions.

Fees will generally range between .25% and .90%. The negotiated fees are disclosed in the agreement between Gravity and the client. Gravity also licenses our Custom Institutional RoboAdvisory to professional investors charging AUA based basis point fees for the technology with the discretion of trading belonging to our client.

In addition, all fees paid to Gravity for investment advisory services are separate from any fees and expenses charged to shareholders of any mutual fund shares or mutual fund companies. A complete explanation of the expenses charged by the mutual fund is contained in each fund's prospectus.

The fees for accounts are based on an annual percentage of assets under management or assets under administration. The fee is applied to the account asset value on a pro-rated basis, billed either monthly or quarterly in either arrears or in advance, depending on what is the agreement, existing billing practices and the custodian capabilities. The initial fee will be based upon the date the account is accepted for management by execution of the investment advisory contract by Gravity. Thereafter, the fee will be based on the market value of the account on the last day of the previous calendar quarter and will cover the period from the first day of the calendar quarter through the last day of the calendar quarter. Gravity may also bill monthly. The market value will be determined as reported by the adviser's Custodian. The Adviser or custodian will report the assets to Gravity. Fees are assessed on all assets under management, including securities, cash and money market balances.

Gravity may allow for portfolios to contain some assets that are excluded from billing under special circumstances, if such assets are included in the portfolio optimization but are not traded or monitored.

The preferred form of payment is a debit from the investors account paid by the custodian to Gravity with a wire transfer.

Upon termination, the advisor is solely responsible for monitoring the portfolio in the accounts, and Gravity as an investment sub adviser will have no further obligation to act or advise with respect to those assets.

Gravity receives no compensation for any commission business; please see section on conflicts of interest. Gravity inherits the existing brokerage relationships and commission structure of our clients where such structures vary from firm to firm and many of such costs are born directly to the investor.

6

Performance-Based Fees and Side-By-Side Management

Performance based fees only as applicable and prudent to qualified accredited investors with the belief that such investors are professionally sophisticated. Gravity is not currently billing any investors performance-based fees.

7

Types of Clients

Gravity provides investment sub advisory services to registered advisors, broker dealers, family offices, institutions, fund companies, pension and profit sharing plan consultants, corporations, trust, banks, charitable/non-profit organizations, and government entities and hedge funds. Gravity maintains a clientele of professional investors. Our Code of Ethics and Personal Trading Policy (“Code”) requires supervised employees to report all investment activity.

Our advice is tailored around the existing business practices of our clients, embracing their processes and combining our expertise in our largely systematic, Digital Advisory process, through our Diversification Optimization™ and institutional platform technology. Our advice and technology services are further tailored by the aggregate AUM-AUA minimums placed with us by our advisor client.

8

Method of Analysis, Investment Strategies and Risk of Loss

Based on our proprietary logic we can create custom model portfolios that generally conform to the following process. For any client relation or model various steps or elements may be shared, omitted or designated as the responsibility of our client or a third party.

Our system, in development since 2000, consists has the following major components which are central to our portfolio management capabilities.

1. Portfolio Visualizations
2. Portfolio Evaluation
3. Portfolio Risk Measurement
4. Portfolio Diversification Measurement
5. Portfolio Charting
6. Portfolio Analytics
7. Portfolio Back-Testing
8. Portfolio Optimization
9. Systemic Risk Measurement
10. 3D Interactive PDF Reports

Many of these capabilities are unique to Gravity and constitute a competitive advantage for investors, partners and clients.



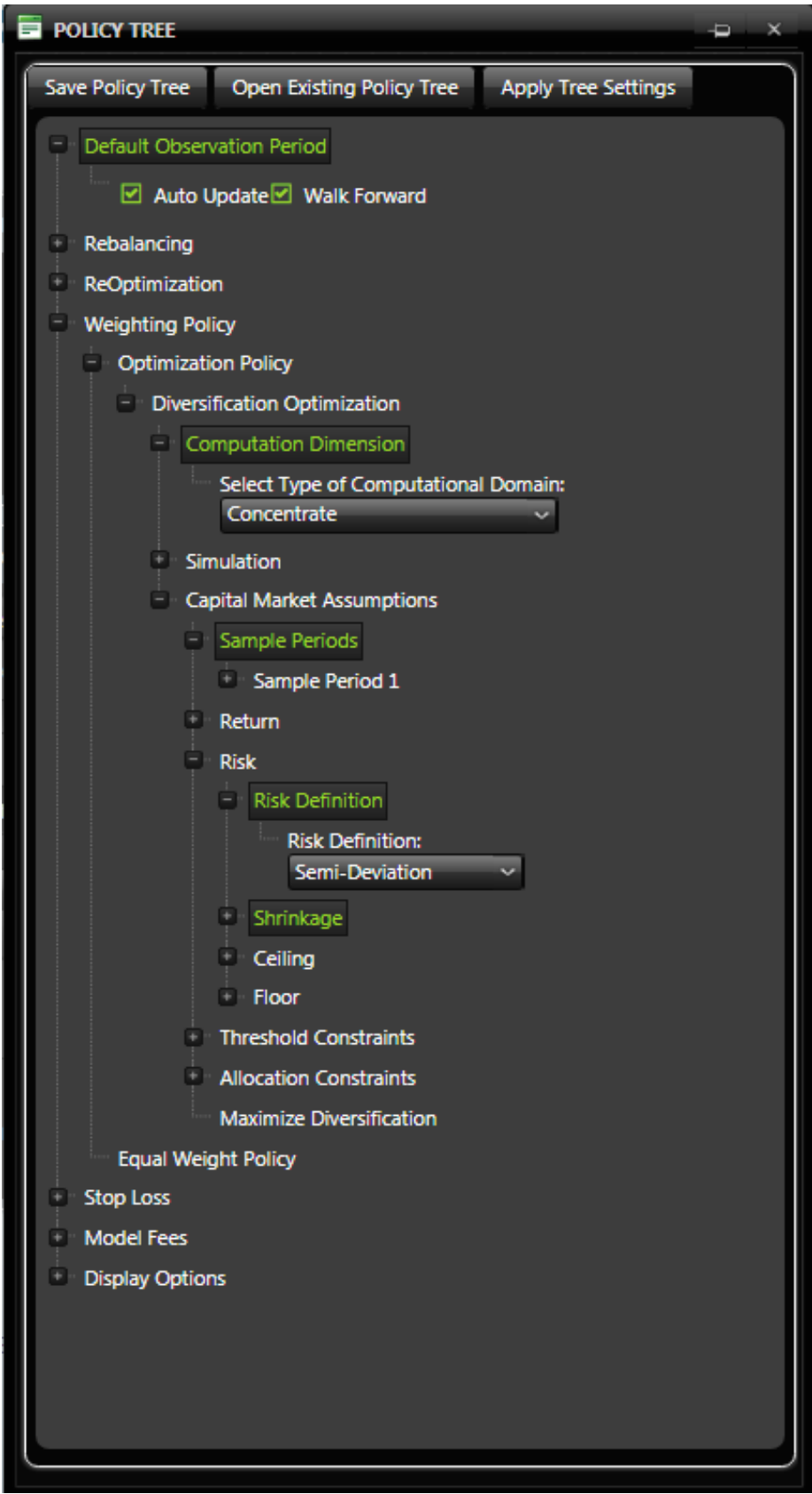
Visionary Technology

Gsphere technology is built to last. No fads or gimmicks. Just powerful performance packed in a friendly and intuitive system. Do you want a partner for the long haul that you can grow and work with? We don't hide behind generic help emails or call centers. With Diversification as our base, we have a remarkable ability to assimilate techniques to add value. Gsphere is built to win.

Gravity's Investment Policy Tree, a central feature set of our Automated Portfolio Optimization Platform can create out of sample walk forward multi-period backtest. We believe this represents the gold standard of portfolio backtesting and is a useful complement to custom portfolio strategies as it provides the most realistic assessment of the performance of a custom strategy that an investor would have experienced. While past performance is not necessarily indicative of future returns, we believe that this tool represents the most honest assessment available.

The backtesting engine circumscribes the optimization engine which creates Diversification

Weighted® portfolios. This also enables a skilled portfolio manager to generate capital



market assumptions to be used as inputs to the optimization and we believe that following some researched best practices can provide a predictive edge in forecasting resulting in better investor portfolios.

Sophisticated and Automated Portfolio Backtesting

Gsphere has automated a walk forward out of sample, multi-period backtest. This is the gold standard of portfolio and strategy backtesting that has removed all biases, so you can judge the veracity of the strategy, buy list or optimization protocol. Results of these tests can be used in reports. Includes designated combinations of reoptimizations and rebalancings for the most accurate and unbiased look back of any strategy or custom portfolio solution.



Our Automated Portfolio Optimization Platform can allow for investors to set portfolio objectives.

The screenshot shows a window titled "OBJECTIVES" with a close button in the top right corner. Inside the window, there is a header "Set the Objectives you want to apply" and a paragraph: "Please prioritize what portfolio attributes are important to you. These portfolio objectives compete with each other for your preference. Portfolios can't be great at everything. Tell Gsphere what you want your portfolio to be great at."

Below the text, there are seven sliders, each with a title and two labels at the ends:

- Total Return**: Labels are "Not Important" on the left and "Essential" on the right. The slider is positioned towards the "Essential" end.
- Capital Preservation**: Labels are "Not Important" on the left and "Essential" on the right. The slider is positioned towards the "Essential" end.
- Current Income**: Labels are "Not Important" on the left and "Essential" on the right. The slider is positioned towards the "Essential" end.
- Stability**: Labels are "Not Important" on the left and "Essential" on the right. The slider is positioned towards the "Essential" end.
- Minimizing Tax**: Labels are "Not Important" on the left and "Essential" on the right. The slider is positioned towards the "Essential" end.
- Minimizing Market Exposure**: Labels are "Not Important" on the left and "Essential" on the right. The slider is positioned towards the "Essential" end.
- Time Horizon**: Labels are "Short term" on the left and "Long term" on the right. The slider is positioned towards the "Long term" end.

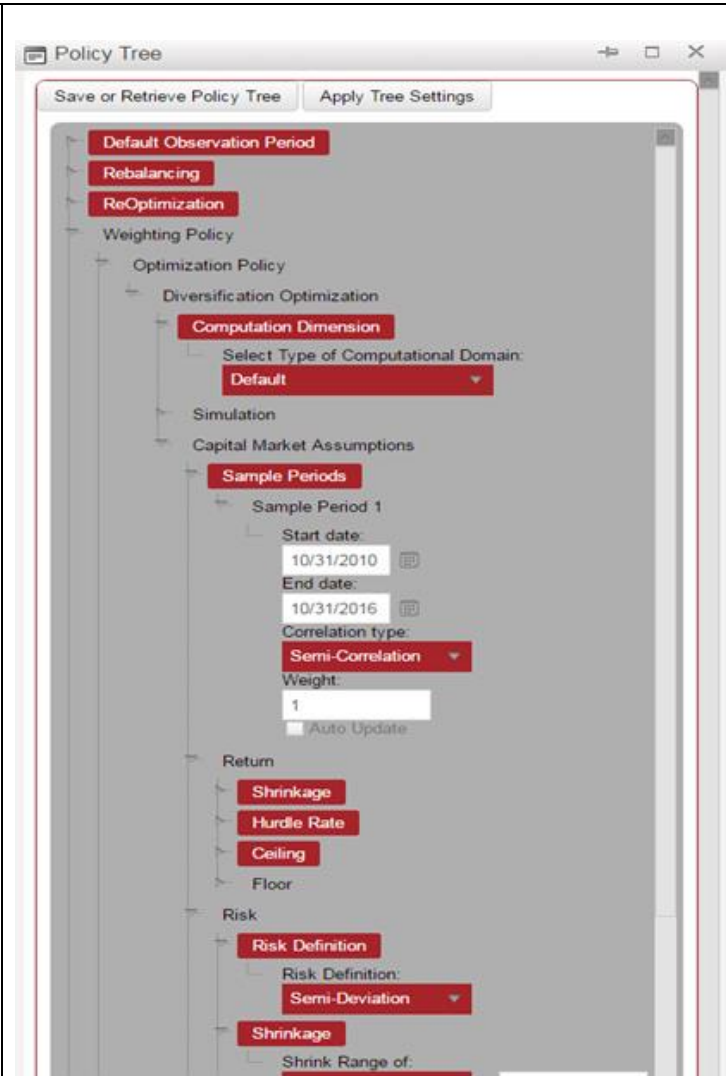
At the bottom of the window, there are two buttons: "Cancel" and "Save".

The objectives prioritized by the investor or by the advisor on behalf of the investor maybe used to customize the portfolio by redefining the investors utility and matching the best assets from the investable universe to that investor based on providing the optimal combination of utility and diversification. This is Diversification Optimization™ which we invented and patented.

This framework offers an advantage over risk and return based system as it provides a more expansive, flexible and realistic set of objectives besides just risk and return that can be important to investors.

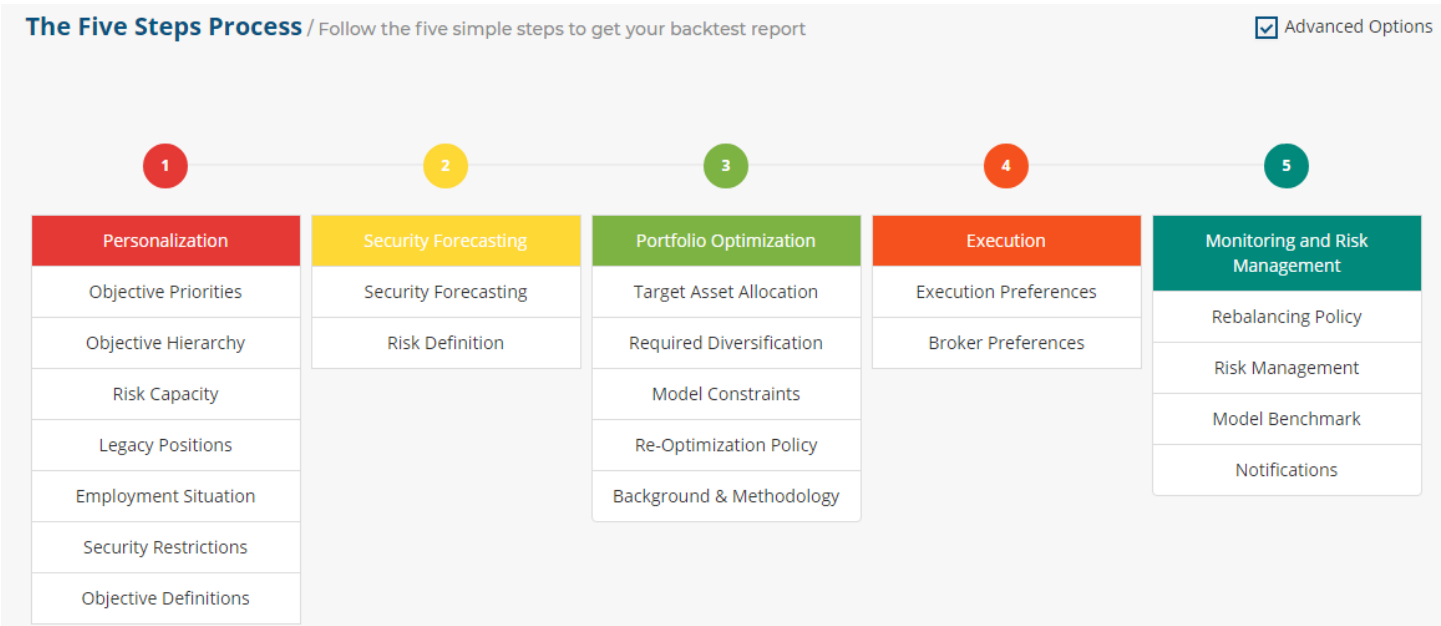
Gravity will utilize our deep set of optimization policies preconfigured for various portfolio objectives. Our growing policy library consists of:

- Automatic Reoptimization
- Rebalancing
- Simulation
- Multi-Sampling
- Auto Update
- Walk Forward Testing
- Automation
- Shrinkage (James / Stein Estimation)
- Custom Shrinkage Targets
- Correlation Calculation Options
- Sample Weighting
- Elective Calculation Dimension
- Risk and Return Forecast Importing
- Risk and Return manual forecasting
- Risk and return estimation logging
- Position Constraints
- Global Constraints
- Risk & Return Estimation Floor
- Risk & return Estimation Ceiling
- Custom Hurdle Rate
- Stop Loss Options
- Risk Definitions
- Threshold Constraints



These policies are expertly managed by Gravity and elegantly combine behind the scenes with the investor objective information to place compliant guiderails on the recommendation. A partial view of such a policy tree is given above. The intellectual capital of setting these policies, we believe is a sustainable source of investment performance.

Investor are able interface with the optimization engine with a user-friendly Investment Policy Statement:

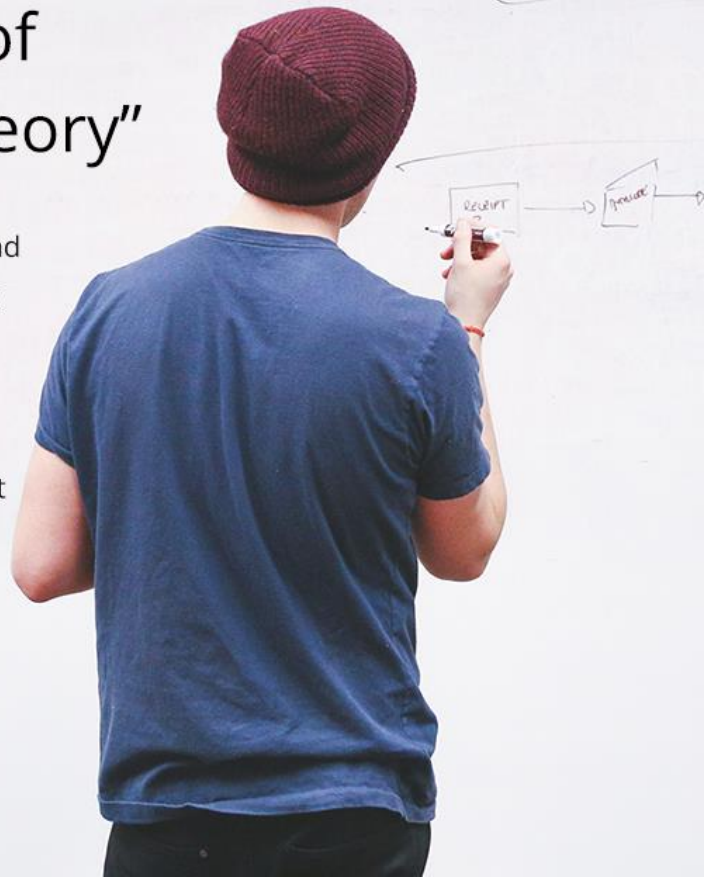


The creation and practice of this investment process does not protect investors from all risks. A sound investment process may insulate investors and their adviser from dangerous emotional responses to market activities. However, neither diversification nor a sound investment process will fully protect portfolios from loss or protect against losing investments or loss of capital.

We tend to define risk with the gravest interpretations. We do not associate more risk with more return, rather we believe that risk is the antagonist to returns. Risk is losing money. Gravity seeks a consistent theory of investing and strives to eliminate and capitalize on many of the prevailing dogmatic and erroneous widely held beliefs. First amongst these is the belief that taking more risk will lead to greater return.

Solve the Fallibilities of “Modern Portfolio Theory”

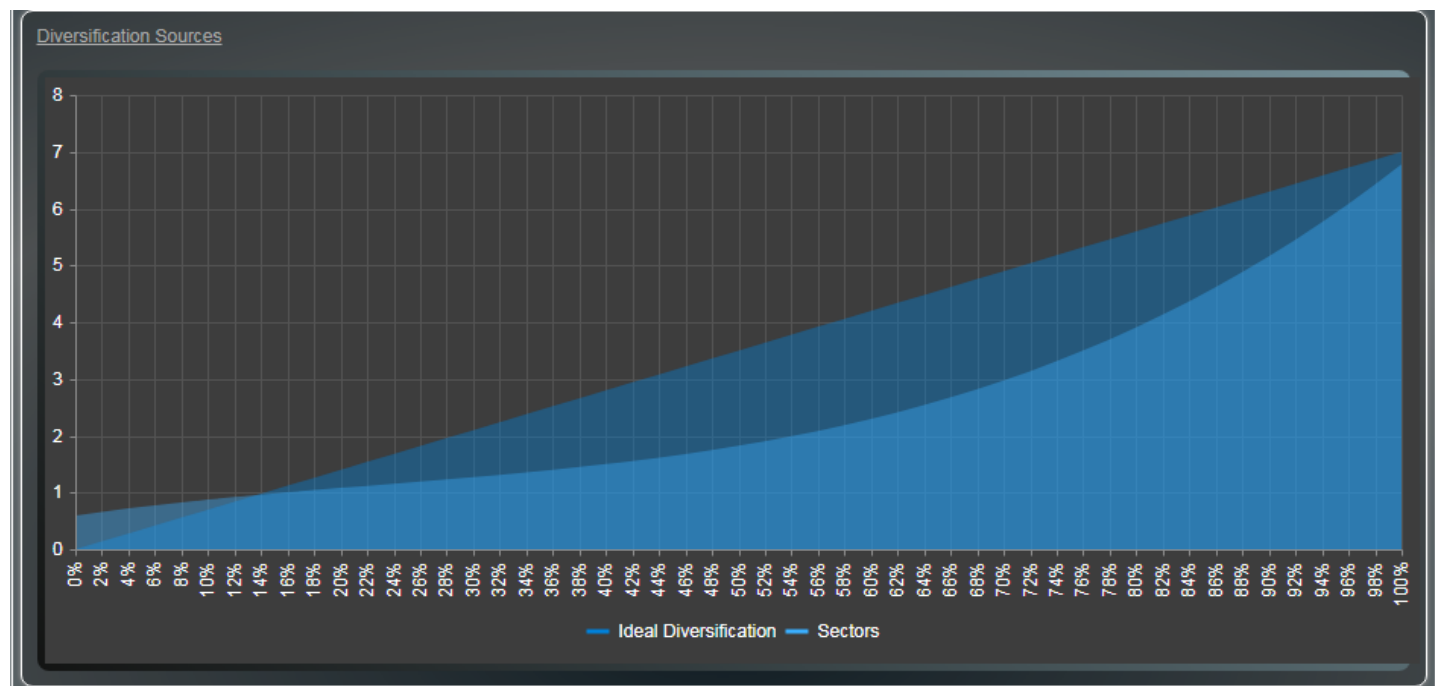
We took the best thing of MPT (Diversification) and removed the rest of the baggage. By partitioning Diversification from being a stepchild of variance minimization and making diversification its own, measureable and manageable dimension of portfolio construction, we have freed the the best part of Modern Portfolio Theory from all the dillutive assumptions.



Diversification measurement, optimization, visualization and search are catalytic to reducing risk in a portfolio, especially systematic and non-systematic risks. Contrary to academic theory based on compounding assumptions, we firmly believe that systemic risk may be diversified. We analyze and manage systemic risk in model portfolios by seeking to minimize the exposure of a portfolio to principal risk factors or dimensions. Our technologies to measure system risk do no eliminate systemic risk from portfolios.

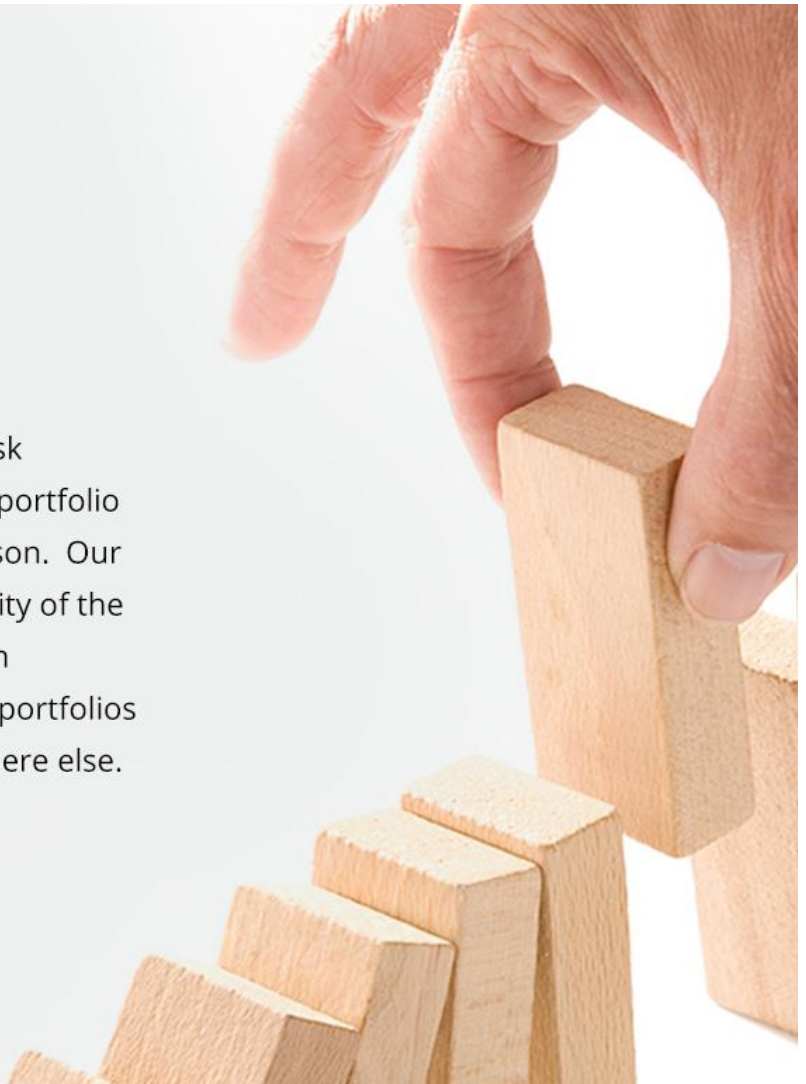
We do expect to reduce the systemic influence in the portfolio however, depending of the strategy such risk may only realize a marginal reduction, and no reduction at all can be known with certainty. Clients of the firm may request a dimension analysis to better understand the impact of systemic risk in their models.

An illustration of this analysis follows. The methodology and graphics are patented under patent # 8,156,030



Systematic Risk Measurement

Our patented science for systematic risk measurement could easily be the first portfolio metric you look at...and with good reason. Our charts and values distill the commonality of the investments in any portfolio so you can understand, educate and improve the portfolios systematic risk. This is available no where else.



Substantive risks that are not impacted by True Diversification® include operational risk and behavioral risk. The impact of True Diversification® on liquidity risk, interest rate risk, and event risks is difficult to predict and will vary with the portfolio model and investment options.

Gravity models endeavor to avoid assets containing liquidity risks and counterparty risks, preferring assets that can be traded and cleared at nationally recognized exchange.

Gravity Capital Partners invests in assets of relatively liquid securities. During extraordinary periods of turmoil and extreme overall market risk, which cannot be statistically ascertained from historical data or otherwise predicted the mere commonality of investing in liquid securities provides a potential antagonist to the efficacy of diversification practices.

Additional risks which may be collectively categorized as investment risks are, stock risk, sector risk, country risk, foreign exchange risk, etc. A portfolio's unique exposure to such risks will typically be diversified and such risks are deliberately assumed by the portfolio manager or investment committee.

All portfolio models are scientifically analyzed based on various diversification and risk measures.

Other Information

Gravity does not offer any products or services that guarantee rates of return on investments for any time to any client. All clients assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices or investment products. We may invest in securities issued by clients who are publicly-held companies for other client accounts that through our investment process we have determined are appropriate investments for our clients. Although this practice occurs infrequently, it creates a conflict of interest when it does occur. Our Code describes our fiduciary duty to act in the best interest of our subadvisor clients and we have investment policies and procedures in place to support this fiduciary duty. Further, our adherence to a scientific process for determining allocation greatly reduces the potential for such a conflict. Certain securities overlap across strategies which could potentially create an opportunity for us to favor one strategy over another. We believe that our firm's current assets under management are vastly insufficient to create sufficient market impact for such potential conflicts of interest to materialize. As our firm grows, we will continually review and revise our policies should any such potential conflict require additional policies and management.

Gravity advocates to all clients the visual evangelism of scientific diversification and a diversification centric orientation for client meetings, communications and prospect presentations.

Research Resources

Gsphere is our own proprietary optimization and analytic platform for building and analyzing portfolios.

We believe this is a world class Institutional Portfolio Optimization Digital Advisory Platform and has many advanced features we use during portfolio construction and analysis. A feature list of reporting and analytics:

- Custom Reporting
- Custom Branding
- Factsheets
- 3D pdf Generation
- Excel Export
- Profit & Loss Report
- Correlation Matrix Report
- Custom 3D Strategy Factsheets
- Interactive Gsphere Graphics
- Risk & Return Chart
- Positions Chart
- Calendar Returns
- Trailing Returns
- Risk Table
- Diversificometers
- Diversification Source Chart
- Allocation Chart
- Performance vs. Benchmark
- Benchmark Statistics
- Advanced Quantitative Data
- Asset Performance Spark charts
- Systemic Risk Measurement
- Custom Blended Benchmarks
- Risk & return Bubble Chart
- Upside & Downside Capture
- Alpha, Beta, R2 & Yields

Our security selection is a product of internal research, collaboration with clients, discretionary sector and industry factor models, quantitative, fundamental, valuation and return estimation models. **Wealth management clients may elect to furnish and utilize their own security candidate sets.**



Integrate Your Own Securities

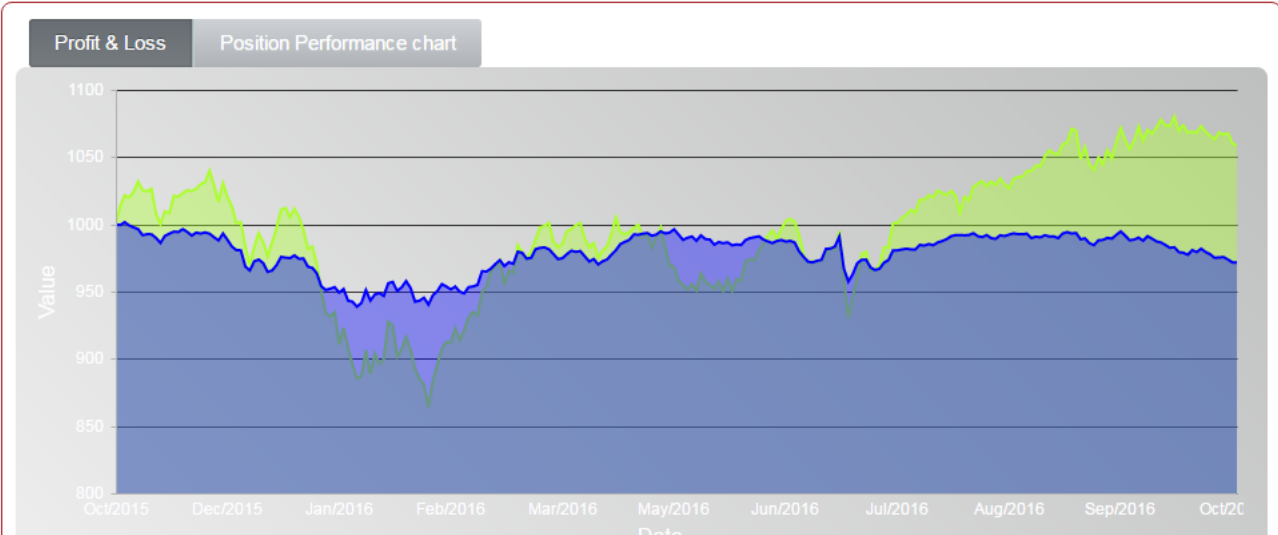
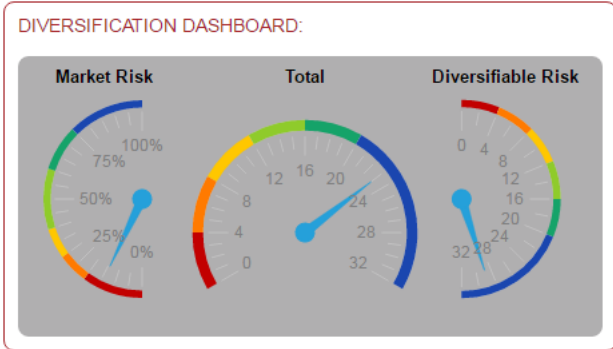
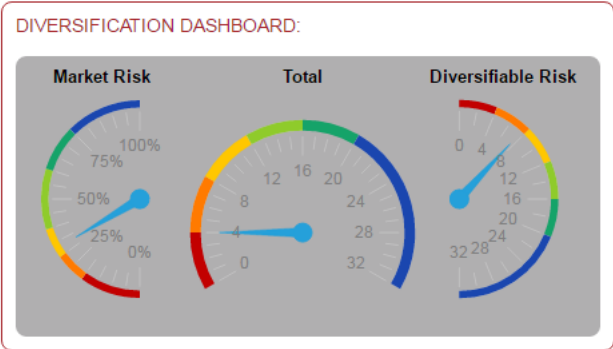
Your team has access to this research page which serves as a central repository for curating your investment universe. Create watchlists and define your investment universe, log notes, and forecasts. Monitor the positions including your watchlists. Easily link to outside research and prepare the portfolio candidate set for optimization.

Gravity utilizes academic research produced by our sister company, Gravity Investments which produced various research products since 2000. Gravity may assimilate research produced by academic journals and our network of industry thought leaders and academics if such research product can be validated and integrated in to our diversification centric process. Gravity is a tier one research partner with Cornell University's graduate MPS quantitative school and together we have developed techniques using artificial intelligence to forecast security prices, filtering for top expected performers can be used as a selection technique.



Access to the system is available to our sub advisory clients. An example of the portfolio view page is below:

The system offers many forms of analysis which we use to help ensure that portfolio strategies have the settings and investment options necessary to meet the portfolio objectives. This includes comparison charts such as the following:



Portfolio Analytics

Gsphere.Net uses portfolio analytics not available anywhere else. You will soon find these analytics become an instrumental part of your investment process. Gsphere can integrate easily into your financial planning process and with it you can rapidly diagnose any portfolio, spot weaknesses and opportunities.



9

Disciplinary History

No principal or employee or independent contractor of Gravity Capital Partners has any disciplinary actions or adverse legal history with any securities or financial regulatory body.

Independent

As an independent company we can better minimize conflicts of interest. We are fiduciaries. We never take a commission. We do not compete with our clients. Our independence allows us to serve our clients, not our parent company



10 Other Financial Industry Activities and Affiliations

Gravity Investments, LLC. has several patents, both issued and pending for diversification optimization, diversification visualization, diversification measurement, and diversification search.

Gravity Capital Partners, LLC. has no affiliations with broker dealers, fund families, insurance companies or fund consultants that create a conflict of interest

through incentivizing sales of their products or services.

11

Code of Ethic, Participation or Interest in Client Transactions and Personal Trading

Gravity does not, as principal, buy securities for itself from or sell securities it owns to any client or as broker or agent effect securities transactions for compensation for any client. Gravity allows employees to invest for their own accounts or have a financial interest in the same securities or other investments that the firm recommends for the portfolios of its clients, and may engage in transactions that are the same as or different than transactions recommended to or made for client portfolios creating a potential conflict. Such transactions are permitted if effected, pre-cleared and reported in compliance with Gravity's policy on personal securities transactions.

Hence, Gravity recognizes the fiduciary responsibility to place its clients' interests

first and has established policies in this regard to avoid any potential conflicts of interest. Reports of personal transactions in securities by Gravity's personnel are reviewed by the firm's Designated Principal quarterly (or more frequently) if required mitigating this potential conflict.

Gravity has developed and implemented a Code of Ethics that sets forth standards of conduct expected of Gravity's advisory personnel. The Code of Ethics addresses

potential conflicts of interest, among other things, personal trading, gifts, the prohibition against the use of inside information and other situations where there is a possibility for conflicts of interest. The Code of Ethics is designed to protect Gravity's clients by deterring misconduct mitigating the potential conflict of interest. The Code educates personnel regarding the firm's expectations and laws governing their conduct, reminding personnel that they are in a position of trust and must act with complete propriety always, protecting the reputation of Gravity, guarding against violation of the securities laws, and establish procedures for personnel to follow so that Gravity may determine whether their personnel are complying with the firm's ethical principles. Gravity will provide a copy of the Code to any client or prospective client upon request.

The principals of Gravity own an affiliated, unregulated entity, Gravity Investments which may create a potential conflict with Gravity. Gravity Investments may promote and license technology, consulting and other services to investments managers, including services and technologies principally designed to assist the investment firm in increasing assets under management. Gravity Investments is not directly compensated for increasing assets under management. However, there may be indirect incentives for assisting in the sales of such companies. This indirect incentive may create a potential conflict of interest to investors and other business partners of Gravity. While there is no absolute safeguard against such a conflict, this conflict is addressed by strict adherence to the fiduciary interests of the partner and client.

Additionally, Gravity normally examines portfolio allocations from a systematic perspective, utilizing Gsphere, which utilizes proprietary diversification optimization as science. This technology creates a systematic process, which, when followed, reduces the opportunity for potential subjective biases

12

Brokerage Practices

As we continue to develop the RoboAdvisor solution integrations with Broker Dealers it's becoming important that we advise clients to inquire as to our preferences among Broker Dealers for production availability, costs, technology and integrations.

Gravity works with Broker Dealers that vigorously use technology to achieve best execution and other value-added features for our clients.

Gravity has authority to supervise and direct on an ongoing basis the investments of the Adviser's client. In some instances, Gravity is authorized, in its discretion and without prior consultation with the Adviser to: (1) buy, sell, exchange and otherwise trade any stocks, bonds or other securities or assets and (2) determine the amount of securities to be bought or sold and (3) place orders with the Adviser's Custodian and (4) make in course adjustments in the investors best interest that may deviate from the model portfolio.

13

Review of Client Models

Advisory clients are urged to formally notify the Gravity of any changes in Model Objectives pursuant to their retail accounts. For full automation clients having custom portfolios this can be done automatically with the objective prioritization.

Gravity does not routinely provide performance reporting.

While the underlying securities within the investment supervisory services are monitored, the portfolios are reviewed on a periodic basis. These reviews will be made, and a summation report will be provided to the Portfolio Manager and Chief Compliance Officer of Gravity. These reviews entail contacting our clients to ensure we are being properly notified of material changes to any accounts effected by the Gravity systems. Additionally, we ensure the models are working as expected and no market driven variables have required Gravity to make changes to our model to continue to provide the expected results based on the strategies chosen by the client. In this case we are proactive to ensure Gravity systems are operating as designed and our clients are communicating changes to client needs so we can decide if a new model should be presented to the RIA for consideration.

While this isn't a requirement it adheres to our mission statement to improve the investing experience through our institutional Digital Advisory platform technology resulting in improved investor confidence helping all market participants.

14

Client Referrals and Other Compensation

Gravity has no client referral or other client-based referral compensation relationships. Gravity however does compensate third party solicitors, company contractors, business partners for marketing our sub advisory and consulting services. However, these compensated marketing personnel are not engaged in investment advisory services for Gravity. We strive to minimize the potential for conflicts of interest resulting from quid pro quo relationships.

We strive to provide advice that is non-conflicted and unbiased as Gravity receives no compensation beyond AUM based sub advisory fees or consulting fees.

15

Custody

Gravity does not assume custody of investor assets. Gravity cannot accept or process contributions or withdrawals on investor accounts and has no authority to debit accounts beyond advisory fees billed to that account.

Through a licensed order management system, we are able to work with most reputable custodian banks.

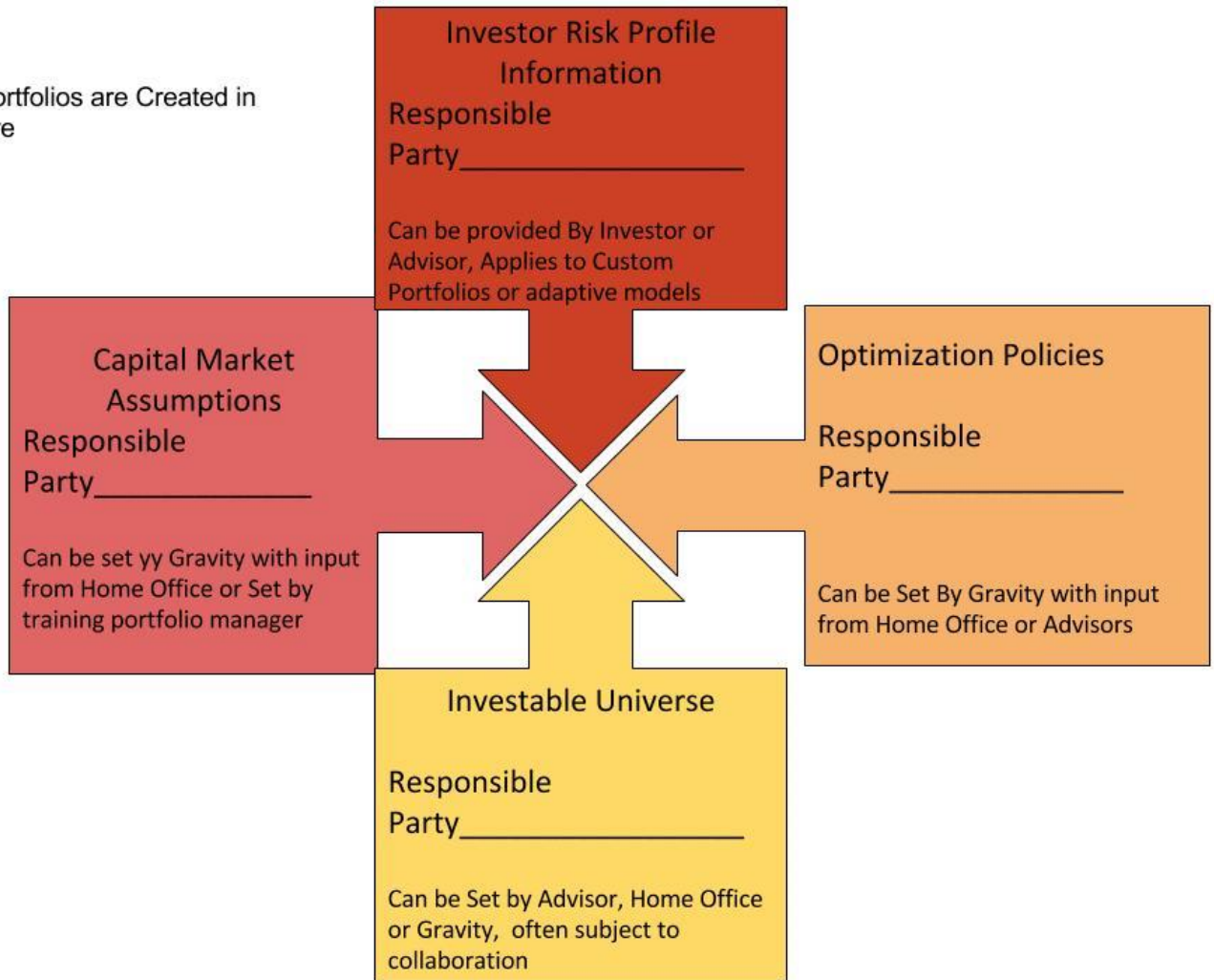
16

Investment Discretion

We provide portfolio management services on a discretionary and non-discretionary basis to the model portfolio per se. Each client may designate a particular and/or custom set of constraints and other processes in concert with the stated objectives of a portfolio. Gravity has authority to manage these portfolios within that framework and allows for periodic revision of such policies.

As depicted below there are four main inputs to our Automated Portfolio Optimization Platform, Gravity and our partners determine in advance of any advisory services which entity provides which services. Gravity can provide all the services as needed.

How Portfolios are Created in
Gsphere



17

Voting Client Securities

Gravity will not have or accept authority to exercise voting power with respect to client securities.

18

Financial Information

Gravity has no material adverse financial or legal conditions which would impair our ability to meet our contracts or fiduciary commitments to our clients.

The Principal Executive Officer is James Damschroder. Mr. Damschroder is also the Chief Investment Officer.

Damschroder has a BA in Finance from the University of Colorado. Mr. Damschroder is the inventor of our patented and patent pending technologies with over 20 years of investment expertise. James is considered a renowned industry expert on the science of portfolio diversification. Damschroder has significant experiences with systematic investment strategies, investment research and machine learning financial prediction systems.

All Principal Executive Officers are also affiliated with Gravity Investments, LLC, and Gravity Investments, Inc, a worldwide leader in Diversification Intelligence, a leader in financial engineering, innovative investment products and technologies. Gravity Investments, LLC developed Gsphere, a patented software program used in the investment industry. Gsphere is currently the only method to precisely measure and quantify True Diversification® or create Diversification Weighting® of any given portfolio.

Gravity Investments has several patents, both issued and pending for diversification optimization, diversification visualization, diversification measurement, and diversification search. At Gravity, we believe that superior technology and superior investment performance are inter-related.

Damschroder is the product owner of the Gsphere system. In the capacity of the Product Owner, James focuses, architects, designs, leads and integrates the many dimensions of desired investment strategies, policies, inventions and operational efficiencies deemed best to improve Gsphere.

Gravity has no affiliations with broker dealers, fund families, insurance companies, fund consultants or custodians that create a conflict of interest.

No Gravity Principal or Gravity Supervisory person has been found liable, implicated or otherwise involved in any scenarios involving; (a) an active investment or a conflicting investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

Neither Gravity nor its Principles collect any incentives from third party financial product firms. Gravity does not receive referral fees of any kind for any investment product recommended in any model.

Other Information

Class Actions and Other Legal Proceedings

We do not participate in legal proceedings, including class actions, on behalf of our clients. However, we will support our investors and advisory clients as feasible.

Privacy Notice

Our Promise to You

You share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided

In the normal course of doing business, we typically obtain the following non-public personal information: Personal information regarding your identity such as name, address and social security number; Information regarding securities transactions effected by us; and Financial information such as net-worth, assets, income, financial account information, bank account information and account balances.

How We Manage and Protect Your Personal Information

We do not sell information about you to third parties, nor is it our practice to disclose such information to third parties unless requested or permitted to do so by you or your representative or, if necessary, to process a transaction or service on an account or as permitted by law.

We may, however, share information about you with our affiliates. Additionally, we may share information with outside companies that perform administrative services for us.

However, our arrangements with these service providers require them to treat your information as confidential.

To protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy restricts the use of your information and requires that it be held in strict confidence.

Client Notifications

We are required by law to annually provide a notice describing our Privacy Policy. In addition, we will inform you promptly if there are changes to our policy. Please do not hesitate to contact us with questions about this notice.